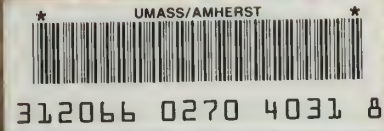


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Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report

EOEA #10458

Logan Airside Improvements Planning Project



Boston
Logan
International
Airport



Massachusetts Port Authority



Federal Aviation Administration

Responses to Comments
Volume 5



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Logan Airside Improvements Planning Project

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March 2001



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Acronyms

Airside Project	Logan Airside Improvements Planning Project
CAA	Clean Air Act
dB	decibel
DEP	Massachusetts Department of Environmental Protection
DOT	Department of Transportation
Draft EIS/EIR	Draft Environmental Impact Statement/Environmental Impact Report
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ENF	Environmental Notification Form
EOEA	Executive Office of Environmental Affairs
EPA	Environmental Protection Agency
ESPR	Environmental Status and Progress Report
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
GEIR	Generic Environmental Impact Report
ILS	Instrument Landing Systems
INM	Integrated Noise Model
Logan Airport	Boston-Logan International Airport
Massport	Massachusetts Port Authority
MBTA	Massachusetts Bay Transportation Authority
MEPA	Massachusetts Environmental Policy Act
MESA	Massachusetts Endangered Species Act
MassHighway	Massachusetts Highway Department
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OPSNET	FAA Air Traffic Operations Network
PM ₁₀	particulate matter less than 10 microns in size
PPP	Peak Period Pricing
PRAS	Preferential Runway Advisory System
ROD	Record of Decision
SDEIS Panel	Supplemental Draft EIS Panel
Supplemental DEIS/	Supplemental Draft Environmental Impact Statement/Final
FEIR	Environmental Impact Report
VFR	Visual Flight Rules
VOC	volatile organic compounds
29M Low Fleet	29 Million annual air passenger Low Fleet
37.5M High Fleet	37.5 Million annual air passenger High Fleet



City of Quincy, Massachusetts

OFFICE OF THE COUNCIL

RESIDENCE 472-9877
VOICE MAIL 376-1356

BRUCE J. AYERS
WARD VI COUNCILLOR



April 12, 1999

Jane Garvey, Administrator
Federal Aviation Admin.
800 Independence Ave. SW
Washington, DC 20591

Re: Logan Airport Expansion Resolve

Dear Ms. Garvey:

Enclosed please find a copy of the Resolve I introduced at the Quincy City Council meeting April 5, 1999, entitled "Resolutions Indicating City of Quincy Opposition To Airside Expansion At Logan Airport And Construction Of Runway 14-32". This Resolve was unanimously passed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bruce J. Ayers", followed by a long horizontal line.

Bruce J. Ayers,
WARD SIX COUNCILLOR

BJA/jm

Encl.

City of Quincy, Massachusetts
In
CITY COUNCIL

Presented by: City Councillor and State Representative Bruce J. Ayers
Monday, April 5, 1999

LETTER 55

**RESOLUTIONS INDICATING CITY OF QUINCY OPPOSITION TO AIRSIDE
EXPANSION AT LOGAN AIRPORT AND CONSTRUCTION OF RUNWAY 14-32**

WHEREAS, the Massachusetts Port Authority operates Logan International Airport and has initiated plans to increase airplane capacity through the construction of an additional runway known as "14-32" by its navigational compass points; and

WHEREAS, the stated reason for construction of this proposed new runway is to reduce delays at Logan Airport; and

WHEREAS, Massport is forecasting such a significant increase in the overall number of aircraft operations over the next five years that delays will reach current levels within that time even if the runway expansion is undertaken; and

WHEREAS, Massport has not fully examined alternatives to airport expansion like diverting more cargo and planes to Hanscom Field and Worcester Airport; and

55.1

WHEREAS, Massport has not yet fully investigated other ways to alleviate the strain on capacity at Logan like increasing transportation access to other regional airports like T.F. Green in Rhode Island and Manchester Airport in New Hampshire; and

55.2

WHEREAS, Massport has not taken advantage of certain internal management tools that could be used to alleviate delays such as a Peak Period Management Program that would save money for those passengers who can travel at a time when the airport typically experiences less service demand and less delays; and

55.3

WHEREAS, Massport has indicated that operation of the new runway would impact several neighborhoods in the City of Quincy, especially, Squantum, West Quincy, North Quincy, Germantown, Houghs Neck, Merrymount, Montclair, Quincy Point and Wollaston; and

55.4

WHEREAS, Massport has not conducted or officially offered to hold any local meetings to better explain this project to our residents, listen to their concerns and to answer their complaints about current problems with air traffic noise and air pollution; and

55.5

WHEREAS, Massport has already filed an Environmental Impact Statement with the support of the Federal Aviation Administration (FAA) to secure the environmental approvals necessary to begin construction on this project; and

WHEREAS, two public hearings will be held this week to discuss the environmental impact that expansion of Logan Airport would cause; and

WHEREAS, all plans to expand Logan Airport must be approved by federal environmental regulators before any construction activity can begin; and

WHEREAS, the City Council of the City of Quincy agrees with the concerns of its citizens about increased noise, vibration and potential health and safety hazards that arise from additional airline traffic and has serious reservations about the need and benefits of proposed runway 14-32; therefore be it

55.6

RESOLVED, that the City Council hereby requests the Federal Aviation Administration to withdraw its support for expansion of Logan Airport at least until the questions of neighboring communities have been answered in better detail; and be it further

RESOLVED, that the addition of more air traffic over the city is unacceptable and the City Council strongly urges that the transportation and environmental needs of the metropolitan Boston area be reviewed in a much broader scope than the proposal currently under consideration; and be it further

55.7

RESOLVED, that in order to take steps to help preserve quality-of-life in our community, the City Council records its objection to expansion of Logan Airport by means of this resolution and urges that it not be granted authorization to proceed; and be it finally

RESOLVED, that the Clerk of the City of Quincy forward a copy of these resolutions to the following parties:

- Mayor James A. Sheets
- Congressman William D. Delahunt, 24 Cottage Avenue, Quincy, MA 02169
- Senator Michael W. Morrissey, The State House, Room 413-E, Boston, MA 02133
Representative A. Stephen Tobin, The State House, Room 166
Representative Ronald Mariano, The State House, Room 234
Representative Liz Malia, The State House, Room 540
- Jane Garvey- Administrator, Federal Aviation Administration, 800 Independence Avenue, SW, Washington, D.C. 20591
- Peter I. Blute, Executive Director and CEO, Massachusetts Port Authority, One Harborside Drive, Suite 200, East Boston, MA 02128
- Betty Desrosiers, Director of Aviation Planning, Massachusetts Port Authority, One Harborside Drive, Suite 200, East Boston, MA 02128
- Neighborhood Centers
- Marie Stamos, Stop the Runway Committee, 747 East Squantum St., Quincy, MA 02171

Based on
Fed back

- Summit with comment
• City Council supported this
Resolution.

• Squantum Cn

City joins Logan runway opposition

Council asks U.S. to block construction

By David McCormack
Patriot Ledger

QUINCY — City councilmen last night asked the U.S. Department of Transportation to block construction of a runway at Logan International Airport.

The unanimous vote by the council asked federal environmental officials to block construction of a new \$22 million runway, which councilmen said would increase air traffic over several surrounding neighborhoods.

The Massachusetts Port Authority, which

owns and operates Logan, says the runway is the airport's southern end and would cut through several neighborhoods and would cut off Quincy from the airport by disallowing taxiway use. Quincy, which has more heavily than other communities around Logan Harbor, has a long history of opposition to the runway. The community's 1980s-era opposition to the runway is still alive and well, as the runway is still being allowed by the runway plan.

The city officials, including Ward 4 District Councilman Ben Brides, said the runway would increase the airport's footprint and would cut off Quincy from the airport by disallowing taxiway use. Quincy, which has more heavily than other communities around Logan Harbor, has a long history of opposition to the runway. The community's 1980s-era opposition to the runway is still alive and well, as the runway is still being allowed by the runway plan.

Quincy neighborhoods are directly in the path of this runway," Ward 4 Councilman Michael D'Amico said. "This would directly impact the quality of life in our neighborhoods. It's important for the city to go forward as being opposed."

Quincy officials also argued that the runway would serve only planes approaching and departing over the Atlantic Ocean.

They would block traffic over Hull but cut the number of planes flying over Quincy, Braintree, Weymouth, parts of Hingham and most of Cape Cod.

But while Mayor Brides has said it is time to use the runway for small planes and only in one direction — toward Boston Harbor — city officials fear some residents fear that will

change as plane traffic increases over the decade.

"Logan simply can't continue to expand within the city of Boston," Councilor-at-Large Paul Harold said. "The only city in the world with a major airport in the middle of the city was Hong Kong, and the Chinese just do that. There's a need for a second airport, especially for cargo and small passenger traffic."

City Council President Peter Kolson said the runway would increase flights 10-fold or testily against the plan at environmental hearings.

Please see RUNWAY — Page

Letter 55

City of Quincy, City Council

Bruce Ayers

Code	Topic 1	Topic 2	Comment	Response
55.1	Regional Transportation	Regional Airports	...Massport has not fully examined alternatives to airport expansion like diverting more cargo and planes to Hanscom Field and Worcester Airport...	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p> <p>Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.</p>
55.2	Alternatives	Regional Airports	...Massport has not yet fully investigated other ways to alleviate the strain on capacity at Logan like increasing transportation access to other regional airports like T.F. Green in Rhode Island and Manchester Airport in New Hampshire...	Massport is supportive of ground transportation improvements to the regional airports. The MassHighway is analyzing alternative routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport. MassHighway is in the process of preparing the EIS/EIR for these highway improvements. Massport supports this project.
55.3	Alternatives	Peak Period Pricing	...Massport has not taken advantage of certain internal management tools that could be used to alleviate delays such as a Peak Period Management program that would save money for those passengers who can travel at a time when the airport typically experiences less service demand and less delays;....	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
55.4	Noise	Impacts	...Massport has indicated that operation of the new runway would impact several neighborhoods in the City of Quincy, especially Squantum, West Quincy, North Quincy, Germantown, Houghs Neck, Merrymount, Montclair, Quincy Point and Wollaston;....	In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overfly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. In fact, the most heavily impacted communities will experience a decrease in overflights compared to 1998 levels. With the Preferred Alternative, when Logan Airport reaches 29 million passengers, overflights from Runway 4 arrivals and Runway 22 departures, which affect South Boston, Quincy, Milton, and Braintree, will decrease from 107,861 in 1998 to 58,305 operations. Similarly, overflights affecting Winthrop (Runway 27 arrivals and Runway 9 departures) will decline from 88,224 in 1998 to 55,805. As a result of the relief for these communities, flights over the water and flights over less impacted communities will increase.
55.5	Environmental Review Process	Public Process	... Massport has not conducted or officially offered to hold any local meetings to better explain this project to our residents, listen to their concerns and to answer their complaints about current problems with air traffic noise and air pollution;....	<p>There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

Code	Topic 1	Topic 2	Comment	Response
55.6	Alternatives	Runway 14/32	...the City Council of the City of Quincy agrees with the concerns of its citizens about increased noise, vibration and potential health and safety hazards that arise from additional airline traffic and has serious reservations about the need and benefits of proposed Runway 14/32;....	A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.
55.7	Environmental Review Process	MEPA	...the addition of more air traffic over the city in unacceptable and the City Council strongly urges that the transportation and environmental needs of the metropolitan Boston area be reviewed in a much broader scope than the proposal currently under consideration;....	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. Unidirectional Runway 14/32 would also give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals, and redirect many flights to overwater routes. During very high demand periods, the controllers currently have little or no flexibility for runway selection. The addition of Runway 14/32 would be the single most important mechanism to achieve equitable geographic distribution of aircraft operations. Massport and the FAA are committed to the PRAS system and have been making improvements since 1982.



The City of REVERE, MASSACHUSETTS

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

FRANK STRINGI • DIRECTOR

281 BROADWAY, REVERE, MA 02151

ROBERT J. HAAS, JR.
Mayor

(617) 286-8181 Fax (617) 286-8180

LETTER 56

April 12, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge Street
20th Floor
Boston, MA 022025

RE: Draft EIR Logan Airside Improvements Planning Projects - EOE
#10458

Dear Mr. Pugsley:

The City of Revere Department of Planning and Community Development in conjunction with the Mayor's Office has reviewed the above referenced EIR and offers the following comments:

Massport's prediction that the airport will grow from the 1996 level of 25 million to between 37.5 million and 45 million passengers per year by 2010 can only result in a substantial increase in air traffic and attempts to increase capacity at Logan. This no doubt will be the case should Massport not aggressively pursue a realistic plan to coordinate this projected growth in operations with other airports accessible to the Boston metropolitan area within the Route 495 belt. This growth factor is of grave concern to the City of Revere given its geographical and topographical relation to Logan Airport. In particular, the Beachmont neighborhood is only 1 1/2 miles from the touchdown point on Runway 22 Left and is presently heavily impacted by air traffic. In general, any attempts to add air traffic and increase operations at Logan to the already overburdened schedule will be harmful to Revere in terms of both noise and operational difficulties including increased vehicular traffic through the community.

The proposed airside improvements and administrative modifications outlined in the EIR are designed to accomplish one purpose - the need to accommodate more air traffic at Logan. If this is accomplished, it will be at the expense of the health, safety and welfare of neighboring communities.

Proposed Lowering of Weather Minimums for Landing on Runway 22L

Lowering the decision heights for landing on Runway 22 Left in poor visibility weather would allow greater air traffic over the Beachmont Hill under poor visibility conditions. The present decision height is 420 ft. and is directly over Beachmont Hill along the glideslope. Aircraft which are told to abort landings due to poor visibility would not impact Beachmont Hill - meaning there would be less aircraft flying over Beachmont Hill in poor visibility conditions. With the decision height brought down to 217 ft. along the glideslope, more air traffic would be flying over Beachmont Hill under worse weather conditions. In poor visibility weather the pilots do not have to see Beachmont Hill in their approach. Given the already narrow envelope between the existing approach path at the top of Beachmont Hill, it is feared that a lowered decision height would increase the potential of a hazard for Beachmont residents during poor visibility conditions.

56.1

Proposed Runway 14-32

Runway 14-32 as proposed would allow Logan to become more efficient during moderate to strong northwest winds and allow more flexibility in shifting air traffic away from Runway 22 Left which has the greatest impact on Revere. Revere is more concerned with the implications an additional runway would have on additional air traffic than Massport's proposal to just make existing operations more efficient. The EIR is not totally convincing that less air traffic would result over Revere with the construction of Runway 14-32. It appears the new runway will increase airport capacity at Logan which will obviously result in increased air traffic over Logans neighboring communities.

56.2

Proposed Centerfield Taxiway

The new Centerfield Taxiway will not alleviate traffic on other runways. This proposal would allow for additional aircraft to occupy runways which would in turn increase airport congestion during take offs and landings. This scenario would only further impact the neighboring communities of Revere, Winthrop and East Boston by allowing more flights under tighter conditions.

56.3

Peak Period Pricing

Peak period pricing would have a negative financial impact imposed on the smaller commuter airlines and the communities they serve. This would impact commuter flights and possibly limit these flights during peak periods allowing for increased larger jet traffic.

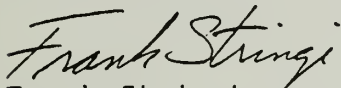
56.4

In addition to the aforementioned comments, the following mitigation measures must be improved within the City of Revere:

- The air pollution monitor is placed at the shore near the ocean where particulate matter dissipates. This location does not provide for a true reading on air pollution, therefore the monitor should be relocated to a more appropriate location. 56.5
- A new noise monitor is needed at the playing fields of the Beachmont School where school children are effected. 56.6
- Aircraft continues to cause considerable soot over the Beachmont area. This must be monitored and analyzed more carefully by Massport. 56.7
- The soundproofing program must be expanded beyond the 65db contour to include such areas as Point of Pines, Shirley Avenue Hill and the rest of Beachmont and the Beachfront. Central airconditioning should be included in the scope of the soundproofing program within the more impacted areas. 56.8
- The need exists to firmly enforce the regulation of flights between 10 pm and 7 am and recertification for Stage 3 aircraft. Many aircraft have been recorded over 95db between 10 pm and 7 am. Over 95db is extremely loud, especially in nighttime and early morning conditions. A definite need exists for recertification if aircraft cannot stay within current noise limits. 56.9

Revere is impacted by Logan Airport in many ways and the need exists for a clear understanding of the valid concerns raised in these comments and assurance of the implementation of the necessary mitigation measures. Given the long history of conflicts with Massport's plans to increase capacity and efficiency at Logan, it is clear that the demands placed on Logan must continue to be distributed to underutilized regional airports.

Respectfully,



Frank Stringi
DPCD Director

C: Mayor Robert J. Haas, Jr.
Revere City Council
Debbie McHatton, Airside Review Committee

Code	Topic 1	Topic 2	Comment	Response
56.2	Alternatives	Runway 14/32	<p>Revere is...concerned with the implications an additional runway would have on additional air traffic...The EIR is not totally convincing that less air traffic would result over Revere with the construction of Runway 14/32. It appears the new runway will increase airport capacity at Logan which will obviously result in increased air traffic over Logan's neighboring communities.</p>	<p>Implementation of unidirectional Runway 14/32 significantly reduces the most severely impacted populations within the 70 and 75 dB noise contours in Winthrop and Revere (refer to Section 6.2 of the Supplemental DEIS/FEIR).</p> <p>Revere is nearest the flight paths of Runway 4L/R departures and Runway 22L/R arrivals. The Supplemental DEIS/FEIR indicates that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals, reducing the current dependence on northeast/southwest operations. This will lead to a decreased percentage of equivalent operations over Revere. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals, cutting dwell and persistence over Revere significantly.</p> <p>The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce the delays that now occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable, and cannot be readily anticipated by passenger or airlines, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts examined in the airside operational and environmental analyses would capture any potential variation in future passenger and aircraft activity at Logan Airport.</p>
56.3	Alternatives	Taxiway Improvements	<p>The new Centerfield Taxiway will not alleviate traffic on other runways. This proposal would allow for additional aircraft to occupy runways which would in turn increase airport congestion during takeoffs and landings. This scenario would only further impact the neighboring communities of Revere, Winthrop and East Boston by allowing more flights under tighter conditions.</p>	<p>The purpose of the proposed Centerfield Taxiway system is to improve the flow of taxing aircraft and to reduce aircraft ground delay. With the Centerfield Taxiway in place, neighbors in Winthrop and East Boston adjacent to the taxiways will experience small reductions in ground noise.</p> <p>These are different from the noise level reductions that occur in parts of East Boston, Revere, South Boston, and Dorchester with the Preferred Alternative. Improvements in those communities are derived from the added flexibility afforded by Runway 14/32. It allows the redistribution of traffic so that there are fewer landings on Runway 4L and 4R and fewer takeoffs on Runways 22L and 22R. The taxiway itself has no bearing on these flights.</p> <p>Dispersion Modeling indicates no violations of the NAAQS at any of the sites shown on Figure 6.3-1 of the Supplemental DEIS/FEIR, including those at public beaches and recreational areas.</p>

Code	Topic 1	Topic 2	Comment	Response
56.4	Alternatives	Peak Period Pricing	Peak period pricing would have a negative financial impact imposed on the smaller commuter airlines and the communities they serve. This would impact commuter flights and possibly limit these flights during peak periods allowing for increased larger jet traffic.	<p>The Airside analysis indicates that PPP is an effective option when airline's schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>
56.5	Air Quality	Monitoring	The air pollution monitor is placed at the shore near the ocean where particulate matter dissipates. This location does not provide for a true reading on air pollution, therefore the monitor should be relocated to a more appropriate location.	The closest PM ₁₀ monitor, located and operated by the DEP, is on Bremen Street. In the Supplemental DEIS/FEIR, receptor sites, some near the ocean-side residential communities adjacent to Logan Airport, were modeled with real meteorological conditions.
56.6	Noise	Monitoring	A new noise monitor is needed at the playing fields of the Beachmont School where school children are affected.	Requests for new noise monitors should be addressed to Massport.
56.7	Air Quality	Soot	Aircraft continues to cause considerable soot over the Beachmont area. This must be monitored and analyzed more carefully by Massport.	Although PM ₁₀ emission factors for aircraft are generally not available, a conservative estimate was used for the Supplemental DEIS/FEIR. The dispersion modeling indicates there will be no violations of the NAAQS for fine PM ₁₀ . The modeling included Logan Airport emissions and background emissions. Furthermore, PM ₁₀ in urban areas is composed of compounds from a variety of sources, primarily roadways. Monitoring of airborne soot levels in the vicinity of Logan Airport has shown that the airport is a very small (less than 1 percent) contributor. The air quality analysis, based on EPA/DEP models and guidelines, is considered to be comprehensive and state-of-the-art.

Code	Topic 1	Topic 2	Comment	Response
56.8	Noise	Sound Insulation	The soundproofing program must be expanded beyond the 65 dB contour to include such areas as Point of Pines, Shirley Avenue Hill and the rest of Beachmont and the Beachfront. Central air conditioning should be included in the scope of the soundproofing program within the more impacted areas.	<p>Logan Airport has one of the most comprehensive and progressive sound insulation programs of any airport in the country. It was initiated in 1980 before any airport began receiving federal funding to soundproof homes under FAR Part 150. It is the only program in the country to offer residents extra sound insulation treatment in a "room of preference" chosen by the homeowner and it is the only program in the country attempting to receive FAA approval to expand the area of eligibility by accounting for hill effects. In addition, as of the 1999–2000 construction season, FAA grants covering 80 percent of the cost of sound insulation (paid for by airline ticket taxes), combined with funds provided by Massport through Passenger Facility Charges and landing fees, had fully funded the sound insulation of all eligible dwelling units in Massport's current sound insulation program. Despite this accomplishment, Massport continues to seek means of expanding its sound insulation program exclusive of FAA's decision on this Supplemental DEIS/FEIR. If the FAA approves the Preferred Alternative, Massport is committed to expanding the program to include all additionally eligible residences.</p> <p>Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i>. Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including:</p> <p>Noise abatement and runway use restrictions;</p> <p>Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation;</p> <p>Encouraging growth at Worcester Regional Airport and other alternative airports; and</p> <p>Monitoring and improving achievement of PRAS goals.</p>
56.9	Noise	Nighttime Noise	The need exists to firmly enforce the regulation of flights between 10 pm and 7 am and recertification for Stage 3 aircraft. Many aircraft have been recorded over 95db between 10 PM and 7 AM. Over 95db is extremely loud, especially in nighttime and early morning conditions. A definite need exists for recertification if aircraft cannot stay within current noise limits.	In addition, Massport is committed to exploring other measures to reduce nighttime noise whether or not the Preferred Alternative is implemented.



LETTER 57

City Council

April 15,- 1999

Secretary of Environmental Affairs
Mr. Arthur Pugsley - IOEA No 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Attention: MEPA Office

Dear Mr. Pugsley:

On February 19, 1999 the City of Revere received the Draft Environmental Impact Statement and Draft Environmental Impact Report ("Draft EIS/EIR") relative to the Logan Airside Improvements Planning Project, ("Project"), submitted by the Massachusetts Port Authority and the Federal Aviation Administration.

Upon receiving the "Draft EIS/EIR" the City of Revere requested the Massachusetts Port Authority to provide the City of Revere with the financial assistance to evaluate the "project" impact on the City.

Inasmuch as the City of Revere has not received a response to its request from the project proponents, on April 05, 1999 the Revere City Council adopted the following resolution:

Whereas: The Massachusetts Port Authority has not responded to Revere City Council Order #99-73, requesting that the Massachusetts Port Authority provide the City of Revere with funding to review the impact of the Draft Environmental Impact Report (Logan Airside Improvements) dated February 19, 1999; and

57.1

Whereas: the further expansion of Logan International Airport will result in additional landings and take-offs at Logan resulting in additional adverse noise impact to the City of Revere; and

57.2

Whereas: the Massachusetts Port Authority has declined, thus far, the City of Revere's invitation to work with the City to address the City's concerns about noise pollution impacts from jets landing and taking off at Logan Airport.

57.3

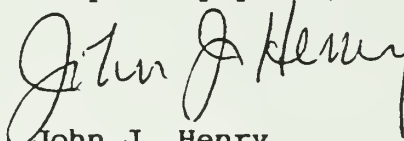
Page 2
April 15, 1999

Now, Therefore, Be It Resolved: That the City of Revere record its opposition to further expansion at Logan Airport as, contained in the Massachusetts Port Authority's Draft Environmental Impact Report and further that the City of Revere join with the Mayor of the City of Boston, the Honorable Thomas M. Menino, in calling for a moratorium on airport expansion until an independent commission can develop a regional transportation strategy.

57.4

Please include the City of Revere's comments as a response to the "project Draft EIS/EIR".

Very truly yours,



John J. Henry
City Clerk
on behalf of the Revere City
Council

c: City Council
Mayor
C.O. 99-73/99-73A

Code	Topic 1	Topic 2	Comment	Response
57.3	Environmental Review Process	Public Process	...the Massachusetts Port Authority has declined, thus far, the City of Revere's invitation to work with the City to address the City's concerns about noise pollution impacts from jets landing and taking off at Logan Airport.	<p>There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

Code	Topic 1	Topic 2	Comment	Response
57.4	Environmental Review Process	Blue Ribbon Panel	...the City of Revere...[calls] for a moratorium on airport expansion until an independent commission can develop a regional transportation strategy.	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>As summarized in the Airside Project Draft EIS/EIR, a number of studies that address regional transportation planning issues have been conducted over the last ten years. These studies have concluded that the Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high speed rail are all necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation.</p> <p>Chapter 2 of the Supplemental DEIS/FEIR discusses the entire region's air transportation system, along with a discussion of alternative modes, specifically high-speed rail, and describes the regional study and its major conclusions.</p>



CITY OF SOMERVILLE, MASSACHUSETTS
OFFICE OF HOUSING & COMMUNITY DEVELOPMENT

WILLIAM ROCHE
ACTING MAYOR

JAMES J. BRETTEA
EXECUTIVE DIRECTOR

LETTER 58

DIRECTORS
Mary Jo Bohart
Paul Connolly
Todd M. Fontanella
Sherri N. Geldersma
Paula Stuart

April 23, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

RE: EOE # 10458 - COMMENTS ON DRAFT EIR/EIS - AIRSIDE
IMPROVEMENTS PROJECT, LOGAN AIRPORT

Dear Secretary Durand::

This letter serves to transmit additional comments from the City of Somerville on the above referenced project. Enclosed, please find the City's comments previously submitted for your records.

The City is already on record regarding certain components of the Airside Improvements Project, in particular the construction of Runway 14/32. Here, I'd rather raise some general issues which focus more on the completeness and adequacy of the draft EIR/EIS.

Our overall impression is that Logan is developing Runway 14/32 because it hopes to put a major dent in the low-fare airline wars. Repeatedly throughout the document, it is clear that Massport is not cooperating with the other regional airports - it is competing for their business. **Competition is the key ingredient driving Logan's expansion.** This fact is bolstered by Massport's own use of the term "leakage" in the document. For us, that explains Massport's emphasis on expansion of this facility. It is assumed to be the path of least resistance and expense. The facility is also

Secretary Durand
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one that is under Massport's control.

The EIR/S is instructive. It illustrates well that other airports are absorbing some market share, and reducing the need for passengers to fly to Logan in order to connect to other markets. The other airports have been successful in luring low-fare carriers - possibly more so than Logan? I'm assuming that this is a market Massport feels it must grow at Logan, or it will continue to see its role in the marketplace decline.

I especially found it interesting that Section 2 continuously discusses "recapture" of passengers. Massport uses this term as if the passengers were Logan's to begin with. This is erroneous: some of these passengers are new trips, others would have chosen alternative transportation or other airports besides Logan. Massport takes every opportunity to tell the reader how important Logan is. Remember, there are new employers and residents in Rhode Island (for example) who did not consider Logan as an alternative - T.F. Green is at their back door.

The details on air/rail ridership changes projected when the Northeast Corridor project is completed are encouraging. It should be noted that Massport has been reluctant to recognize the Northeast Corridor rail project in the past; in fact, the previous Secretary of Environmental Affairs cited that as a deficiency of the annual GEIR two years ago.

Repeatedly, Massport makes determinations about people's mode choice on the basis of travel time and mileage. Discuss the Portland-Boston route, for example. There aren't many choices except for autos at this time. If workable alternatives are developed and promoted, the public will use them.

Massport makes some very true statements about its agency's role in shaping transportation policy. However, it should be noted that agencies above and around Massport have a great deal to do with shaping transportation policy which is favorable to Massport's objectives. The FAA is a clear champion of the airline industry, and has clout. Perhaps FAA cannot "dictate which airports an airline may serve, the schedules or fares a carrier charges", but it can exercise control over airport design, capacity and operation which have a lot to do with an airline's decision to provide service at a given facility, or to pursue a regional policy which decides the role a particular airport will play in a region.

The noise analysis referred to states that the 5,000 foot runway better met Massport's overall objectives, particularly in the area of noise reductions to impacted sensitive receptors. However, Section 3-10 does not go into great detail concerning the performance of each alternative. I'd like to see the "clear benefits" substantiated. Assumed, this means that a larger runway can accommodate more aircraft types, thus removing those aircraft from the other runways which fly over greater numbers of sensitive receptors.

With respect to the centerfield taxiway - I don't have any disagreements with what is stated, but it

Secretary Durand
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is important to point out that this improvement will also increase airport traffic capacity - and, taxiway delays/apron congestion will be relieved for a temporary period. And, with more queue space available, noise and air pollution impacts to adjacent communities will also increase.

58.3

The statement is made that "delay statistics for Logan Airport confirm that it is unable to accommodate existing demand levels without incurring unacceptable levels of delay". Unacceptable to whom? FAA, passengers, Massport? It goes right back to proposing projects which will reduce delay effectively, for a reasonable time period - otherwise, it is dishonest to propose this improvement as a worthwhile delay reduction measure, especially without noting that delays will resume previous levels if an airport-wide growth and expansion plan is to be pursued. **The problem is not adequately defined. In fact, the problem appears to be misrepresented.**

58.4

Regarding ambient sound levels. It is true that nighttime aircraft operations are more noticeable and annoying because the ambient sound level is lower. In surrounding, less urbanized communities, the sound is even more noticeable. This problem will increase with additional flight activity, and may be tempered somewhat by aircraft improvements.

58.5

Passenger Facility Charges (PFC's) - although Massport received approval to assess this fee on each passenger in 1993, is the fee being collected? It was unclear from reading the document.

58.6

It's noted that elevated terrain has an affect on sound propagation - particularly in East Boston. This has been raised in other communities, including Somerville.

58.7

In Summary, the EIS/R fails to address the following:

Project cost to the environment and to human health. Where is the risk analysis, particularly for the anticipated noise exposure and air pollution which will result from this project? Particularly, we believe that the increased activity at Logan Airport will propagate additional traffic - in already congested areas. We have always believed that creating and/or expanding other facilities in the region would cut down trip miles to/from the airport, and would aid overall environmental quality. This is particularly important when the EIR/EIS states that over 50% of Logan passengers originate in the Route 128 and 495 highway regions. Regional employers will appreciate this, too.

58.8

Project cost to property owners. Increased traffic at this location will impact all classes of property owners in the area, particularly those which are sensitive receptors.

58.10

Inadequacy of noise standards. Reliance on an average Day-Night Sound Level (DNL) contour inadequately characterizes true noise impacts associated with the Project. Other reviewers have stated that the use of this average downplays the actual noise levels experienced by sensitive receptors - it is the individual (higher) noise emissions which more negatively impact surrounding residential receptors - not the average level. HUD and FAA definitions are at fault here. We ask

58.11

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Page Four

that MEPA address this issue.

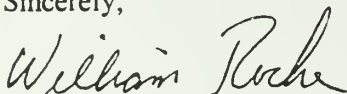
Connection to Landside Improvements. The focus of this Draft EIS/EIR is on the Airside Improvements. The City, after reading the documents, does not believe that improvements to gates, terminals and other landside facilities have been properly presented within the context of this document. That is a serious flaw, because the landside and airside facilities are interdependent and **should not be separated** insofar as both contribute to the state of overall airport operations and the true operational objectives for this facility. The City believes that if this is done, the problem definition will change significantly.

58.12

For the above reasons, we respectfully request that the Draft EIR/EIS be withdrawn. We also recommend that a regional approach be taken to dealing with what is a regional issue. My administration is willing to participate in such an effort.

Thank you.

Sincerely,



William Roche
Acting Mayor

cc: Anastasia Lyman, Massport Citizens' Advisory Committee
Allison Stieber
Todd Fontanella, Somerville CAC representative
James Bretta, OHCD
U.S. Representative Michael Capuano
Senator Thomas Birmingham
Senator Charles Shannon
Representative Patricia Jehlen
Representative Timothy Toomey
Representative Vincent Ciampa
Somerville Board of Aldermen



CITY OF SOMERVILLE, MASSACHUSETTS

WILLIAM ROCHE
ACTING MAYOR

February 11, 1998

Peter Blute, Executive Director
Massachusetts Port Authority
One Harbourside Drive, Suite 200S
East Boston, Massachusetts 02128-2909

RE: PROPOSED AIRSIDE IMPROVEMENTS, LOGAN AIRPORT

Dear Mr. Blute:

This letter is in response to the presentations made by Massport concerning the future of Logan Airport. It is also to comment on the draft Environmental Impact Report/Statement for the proposed Airside Improvements Project for Logan Airport.

The analyses which have been done (and the recent Massport presentation) all support the fact that Logan Airport will continue to grow - in size as well as activity. This presents long-term planning and environmental issues for the communities that live, on a daily basis, with the environmental consequences of Logan's present operations.

I believe that most, if not all parties involved in this issue, appreciate the fact that Logan Airport is important to the region's economic health. However, its role in serving the region's air transportation needs must be balanced regionally if the surrounding environment is to remain habitable.

Somerville is on record as supporting equitable development and distribution of regional air travel and air operations. The information we've been given concerning growth rates at other New England airports looks positive when presented as percentages of growth; however, the numbers

Peter Blute, Executive Director
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from which these are derived (which are more important) definitely indicate undeveloped capacity exists at other regional airports. The percentages are public. Thus, we support the Citizens' Advisory Committee positions - not regional solutions to the capacity problem, procurement of funds to make competitive, such as at Hanscom Field and at Worcester.

We have been told that the airline industry does not prefer to develop facilities in a given market. I would believe that any airline would prefer to do business where their customer base may enjoy better access, less flight delay and more market development efforts on a new facility away from downtown - where most flights originate.

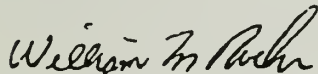
Any airport project which ultimately increases operational capacity, particularly which will impact nearby communities, is of serious concern. In fact, with the construction of Runway 14/32, Massport will continue to promote a policy of continued growth at Logan. This growth will attract new air traffic - and the problem which has been one of Logan's most often cited problems will remain. The reclaimed runways will simply be devoted to future air traffic growth which Massport is planning for.

With regard to review of the draft EIR/S, it has come to my attention that the document has been revised continuously as Massport is receiving input at public meetings. This document, including members of the Citizens Advisory Committee, is an outdated version. It is customary once a draft environmental document is released to solicit comments and to incorporate responses to those comments after the public review is closed. This continuous process deprives reviewers of a fair and meaningful review and should be rejected on principle.

Peter Blute, Executive Director
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I see no need to debate the finer points of numerous technical documents further.
Therefore, I ask to be put on record as opposed to the continued expansion of Logan Airport,
particularly at present against the proposed expansion of Runway 14/32. Thank you.

Sincerely,



William Roche
Mayor

cc: Anastasia Lyman, CAC Chair
U.S. Representative Michael Capuano
U.S. Senator Edward Kennedy
Senator Thomas Birmingham
Senator Charles Shannon
Argeo Paul Cellucci, Governor
Representative Timothy Toomey
Representative Patricia Jehlen
Mayor Thomas M. Menino
Vincent A. Scarano, FAA Airports Division Manager
James Bretta, City of Somerville OHCD
Alison Stieber
The Somerville Board of Aldermen

runways.wro

Code	Topic 1	Topic 2	Comment	Response
58.1	Regional Transportation	Regional Airports	... it is clear that Massport is not cooperating with the other regional airports. ... it is competing for their business. Competition is the key ingredient driving Logan's expansion.	Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives. Massport disagrees that its record in diverting traffic to other airports is unsuccessful. Since 1996 eight out of ten new passengers in New England were directed to regional airports, which include T.F. Green/Providence, Worcester Regional, and Manchester airports. In 1999, Massport estimates that regional airports attracted 2.4 million passengers, that would have otherwise used Logan Airport.
58.2	Noise	Model	The noise analysis referred to states that the 5,000 foot runway better met Massport's overall objectives, particularly in the area of noise reductions to impacted sensitive receptors. However, Section 3-10 does not go into great detail concerning the performance of each alternative. I'd like to see the "clear benefits" substantiated. Assumed, this means that a larger runway can accommodate more aircraft types, thus removing those aircraft from the other runways which fly over greater numbers of sensitive receptors.	In addition to providing more delay reduction, the 5,000 foot runway also reduces the number of people exposed to a DNL of 70 dB or greater. Refer to Section 3.2.1 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
58.3	Alternatives	Taxiway Improvements	...[T]he centerfield taxiway...will also increase airport traffic capacity - and, taxiway delays/ apron congestion will be relieved for a temporary period. And, with more queue space available, noise and air pollution impacts to adjacent communities will also increase.	<p>The Centerfield Taxiway will not increase the number of ground operations at Logan Airport. It will simply increase controller flexibility and reduce delays. The number of aircraft on the taxiway system is directly related to the number of flights operating at Logan Airport and will not change because there is another taxiway.</p> <p>Neither the airlines nor the FAA desire to have extra aircraft idling on the taxiway system, as this would cause unnecessary costs to the airlines, unnecessary environmental impacts, and increased taxiway congestion which would inhibit the ability of controllers to move aircraft to and from the runways. The Centerfield Taxiway will not change the taxiway demand, and by reducing taxiway congestion will reduce the environmental impacts on the surrounding communities</p>
58.4	Purpose And Need	Delay	The statement is made that "delay statistics for Logan Airport confirm that it is unable to accommodate existing demand levels without incurring unacceptable levels of delay". ...[D]elays will resume previous levels if an airport-wide growth and expansion plan is to be pursued. The problem is not adequately defined. In fact, the problem appears to be misrepresented.	<p>The goals of the Airside Project are to reduce delay, increase airport efficiency and improve airfield safety in an environmentally responsible manner. They do not reflect an "airport-wide growth and expansion plan", nor increase the capacity of the airport. Future passenger and operations levels can be accommodated by Logan Airport without any airside improvements but not without delays and resulting adverse environmental impacts. Long-term aviation growth is a recognized worldwide condition that is beyond Massport's control, which means that the sooner the airfield efficiencies are implemented, the more benefits they will accrue over the future.</p> <p>Massport has developed a range of potential future traffic levels for planning purposes. For a variety of reasons, Massport believes that the forecasts described as 1999 and 2010 projections in the <i>Logan Airside Improvements Feasibility Study, Phase I Report and the DEIS/EIR</i> will not be achieved until after 1999 and 2010, respectively. The Airport is likely to reach 29 million passengers (formerly the "1999" forecast) in 2003. Developments at the regional airports and Amtrak's high speed Acela Express rail service to New York are expected to further slow Logan Airport's passenger traffic growth. As a result, Logan Airport is now expected to reach 37.5 million passengers in 2015 and 45 million passengers in 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period that extends beyond 2020. Refer to Chapters 1 and 4 of the Supplemental Draft EIS/Final EIR for a complete discussion of the planning forecasts.</p>
58.5	Noise	Impacts	... It is true that nighttime aircraft operations are more noticeable and annoying because the ambient sound level is lower. In surrounding, less urbanized communities, the sound is even more noticeable. This problem will increase with additional flight activity, and may be tempered somewhat by aircraft improvements.	<p>Check that this is still valid.</p> <p>Table 6.2-17 of the Supplemental DEIS/FEIR shows nighttime jet operations projected to increase from 144 in 1998, to as many as 231 under the No Action Alternative with the 2015 High Regional Jet Fleet. However, regardless of the fleet, many of the future night operations are the result of delays that will occur as demand at Logan Airport continues to increase. One of the direct benefits of the Preferred Alternative is that it will reduce these night operations by 32 to 43 flights depending on the fleet forecast, though any alternative to the No-Action scenario will help alleviate some of the projected delays.</p> <p>In addition, Massport is committed to exploring other measures to reduce nighttime noise whether or not the Preferred Alternative is implemented.</p>

Code	Topic 1	Topic 2	Comment	Response
58.6	Purpose and Need	Economic Impacts	Passenger Facility Charges (PFCs) - although Massport received approval to assess this fee on each passenger in 1993, is the fee being collected? It was unclear from reading the document.	Yes. Massport is collecting PFCs from enplaning passengers at Logan, as authorized by the FAA. PFCs are being used to fund a number of projects at Logan including: the International Gateway Project; Terminal E Modernization; improvements to circulating roadways; construction of elevated pedestrian walkways; residential sound insulation; and the Terminal A Master Plan.
58.7	Noise	Model	It's noted that elevated terrain has an affect on sound propagation - particularly in East Boston. This has been raised in other communities, including Somerville.	<p>Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>).</p> <p>In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model.</p> <p>At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 5 of the <i>Logan Airport 1998 Annual Update</i>). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. Using results from a special study of Terrain Modeling analysis ("hill effects") in Orient Heights and Jeffries Point, Massport applied for and received approval to apply a correction to 1999 contours to account for increased levels in Orient Heights.</p>
58.8	Public Health	Effects	...[the EIS/R fails to address] Project cost to the environment and to human health. Where is the risk analysis, particularly for the anticipated noise exposure and air pollution which will result from this project?	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.

Code	Topic 1	Topic 2	Comment	Response
58.9	Ground Transportation	Access To Logan	...we believe that the increased activity at Logan Airport will propagate additional traffic - in already congested areas. We have always believed that creating and/or expanding other facilities in the region would cut down trip miles to/from the airport, and would aid overall environmental quality.	<p>Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPP</i> (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).</p> <p>Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Airside Project Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.</p>
58.10	Ground Transportation	Access To Logan	[The EIS/R fails to address] Project cost to property owners. Increased traffic at this location will impact all classes of property owners in the area, particularly those which are sensitive receptors.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives.
58.11	Noise	Model	Reliance on an average Day-Night Sound Level (DNL) contour inadequately characterizes true noise impacts associated with the Project. Other reviewers have stated that the use of this average downplays the actual noise levels experienced by sensitive receptors - it is the individual (higher) noise emissions which more negatively impact surrounding residential receptors - not the average level.	For environmental sounds of all types, the EPA adopted the Day-Night Sound Level (DNL) to account for both the magnitudes and duration of the various sounds. The DNL penalizes sounds made during the nighttime (chosen in the United States to be 10 PM to 7 AM) by adding 10 dB to the measured values. It is unfortunate that it is often characterized as the "average level" and therefore some people believe that it does not represent the levels of individual events. Actually, it represents the total noise exposure in a 24-hour day, including a nighttime penalty of 10 dB. Thus, it accounts for all the individual sound events during the 24-hour period. EPA's review of the available case studies on the effects of environmental noise on humans found that DNL correlates better with the effects than any measure of the various individual events.

Code	Topic 1	Topic 2	Comment	Response
58.12	Environmental Review Process	MEPA	[The EIS/EIR fails to address] Landside Improvements. The focus of this Draft EIS/EIR is on the Airside Improvements. The City, after reading the documents, does not believe that improvements to gates, terminals and other landside facilities have been properly presented within the context of this document. That is a serious flaw, because the landside and airside facilities are interdependent and should not be separated insofar as both contribute to the state of overall airport operations and the true operational objectives for this facility. The City believes that if this is done, the problem definition will change significantly.	The proposed improvements analyzed in the Supplemental DEIS/FEIR involve both construction and administrative actions that will facilitate aircraft operations (landings, takeoffs and taxiing). None of the improvements involve landside facility improvements (e.g., terminals and roadways) or related operations. The Supplemental DEIS/FEIR analyzes in detail the impacts from aircraft operations, including analysis of noise and air quality impacts during the years 1993, 1998 and under future forecast scenarios as well as environmental benefits from certain of the improvement concepts under review. In this respect, the Supplemental DEIS/FEIR conforms with scoping directives from the lead federal agency (the FAA) and with applicable FAA environmental orders, all issued in accordance with NEPA, and with directives from EOEA issued under MEPA. The various GEIR documents, including the <i>Logan Airport 1998 Annual Update</i> and the <i>1999 Environmental Status and Progress Report</i> (previously GEIR), provide additional analytic context by examining cumulative impacts from airside (i.e., aircraft) operations and landside (e.g., vehicular traffic, terminal service vehicles) operations at Logan Airport as well as Massport's comprehensive mitigation program. The ESPR/GEIR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR as a background document. Each GEIR/ESPR submission is subject to public review and comment. The <i>Logan Airport 1998 Annual Update</i> and the <i>1999 ESPR</i> analysis is based on the same forecast levels used in the Supplemental DEIS/FEIR. The GEIR/ESPR informs Massport's planning process for all the improvements at Logan Airport, including the improvements under review in the Supplemental DEIS/FEIR. Consistent with past practice, Massport expects that the FAA will take the GEIR/ESPR analysis into account during its deliberations and ultimate decision on the Supplemental DEIS/FEIR.
58.13	Regional Transportation	Regional Airports	... we support the Citizens' Advisory Committee positions - namely to look for regional solutions to the capacity problem, procurement of funds to make other facilities competitive, such as at Hanscom Field and at Worcester. Focus development efforts on a new facility away from downtown - where many of the travelers originate.	Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Airside Project Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
58.14	Purpose And Need	Delays	...with or without construction of Runway 14/32, Massport will continue to promote a policy of development and continued growth at Logan. This growth will attract new air traffic - and the delays which have been one of Logan's most often cited problems will remain. The reclaimed capacity on the larger runways will simply be devoted to future air traffic growth which Massport has admitted it is planning for.	Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport.



CITY OF SOMERVILLE, MASSACHUSETTS
BOARD OF ALDERMEN

LETTER 59

April 22, 1999

WILLIAM A. WHITE, JR.
ALDERMAN AT LARGE

Delivered by hand
Mr. Arthur Pugsley
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202

Dear Mr. Pugsley:

The following are my comments to the Draft Environmental Impact Statement for Logan Airside Improvements Planning Project dated February 1999 ("DEIS"). This response first provides an overview of the current impact of air traffic from Logan Airport on the City of Somerville (the "City"). Next, it details the defects in the noise analysis of the DEIS, paying particular attention to the absolute failure of Massport to analyze current noise impacts on the City by any realistic measures. It then addresses the defects in the DEIS' analysis of the future noise impacts on the City that would result from the construction of the additional runway.

I. OVERVIEW

The City is the most densely populated community in the Commonwealth of Massachusetts with a population of about 80,000. The City stands directly in the path of planes departing from Runway 33 L. (5-30 of DEIS) This runway directs flights over the City when the FAA utilizes the one runway configuration during strong Northwest winds and when the FAA utilizes the two runway configuration during moderate northwesterly winds. (1-19, 1-20 of DEIS) This configuration also is used during weekends, especially mornings beginning at 6:15 a.m., in what Massport illogically describes as the "equitable adjustment of the burdens of air traffic." The City also has a number of hills directly under the flights from Logan

Mr. Arthur Pugsley
MEPA Unit
April 22, 1999
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Airport. While northwesterly winds prevail, the City suffers from constant air traffic, especially during the late evenings until well after midnight followed by early mornings beginning at 6:15 a.m. Massport recognizes that these winds prevail during 37% of the year. (DEIS figure 1.5-7) Because the FAA also uses this configuration during the weekends, affected City residents are unable to receive any respite from this traffic frequently during the fall, winter and spring months.

The topography of the City is such that a number of hills are directly under flights from Logan. Although the City begins about 3 miles from the end of runway 33 L, these elevated areas in the City receive substantial noise impact similar to other areas located much closer to Logan. For example, as a resident of Winter Hill, during the winter I have observed aircraft flying so close to dwellings that noise vibration caused snow to fall off of pitched roofs.

Over the recent past, I and other Aldermen have consistently received numerous phone calls from constituents who have suffered from air traffic noise over the City, including distraught parents of young children who are unable to get 8 hours of sleep. My Winter Hill venue has allowed me personally to experience the impact of air traffic, especially the effects of constant dwell in the evenings and following mornings, that creates a situation where numerous residents are unable to receive a decent night's sleep over extended periods of time. This lost sleep cannot be made up during the weekends because the FAA intentionally directs air traffic over the City on weekends beginning at 6:15 a.m. These concerns have been relayed to Massport's noise complaint telephone line. Massport offers no remediation program for the City and actually downplays the noise impact both in statements to the media and in the DEIS.

Because of growing complaints by residents over noise, the Board of Aldermen last summer invited representatives of Massport to appear before the Board of Aldermen. When asked if Massport had any monitoring devices within the City or had sent anyone to personally observe the noise level, especially over the hilly areas with dense populations, Massport responded negatively. Massport further stated that it would not provide any noise monitors in the City of Somerville. Instead, Massport relies on computer modeling to measure noise in the City. There is no evidence, however, to demonstrate whether Massport's computer modeling accurately reflects the noise born by residents where there are hilly configurations. Clearly, Massport's cavalier attitude toward the City should be

fatal to the DEIS since it shows that Massport has no objective data to demonstrate the real impact of noise on the City's many residents.

II. THE DEIS FAILS TO PROVIDE ANY OBJECTIVE DATA ON CURRENT NOISE OVER THE CITY

Although the heart of the flight tracks from 33L is over the City and is located less than four miles from the end of Runway 33-L, (5-30), Massport locates no noise monitoring equipment within the City or within any reasonable distance from the City. (5-13) Interestingly, many of the noise monitors located to the south of Logan are at greater distances from runways than impacted areas of Somerville. (Id.) Moreover, although many more departures from 33L fly over the City than Everett (see 5-30), Massport does not even consider Somerville to be an area for evaluation (5-19). Despite this lack of objective data over current noise conditions in Somerville, Massport argues that the proposed expansion will "more equitably adjust air traffic" by tripling the volume over the City of Somerville.

59.1

To support its claims relating to noise impact, Massport uses a noise measure which bears no reasonable relationship to the actual noise experienced by people nor the effects of this noise on people. The Day-Night Sound Level (DNL) used by Massport is "a weighted sound level of a steady-state noise during a 24-hour day which contains the same sound exposure as does the summation of the sound exposures from all of the individual events that occur during a 24-hour period, with the provision that noises occurring at night are increased by 10dB." Without doubt, those areas with a high DNL suffer from excessive noise. But because it is a 24 hour average, the DNL understates the actual impact of noise on many affected communities such as Somerville.

59.2

For example, Somerville suffers from severe air traffic on many evenings between the hours of 10:30 p.m. through 12:30 a.m. and the following mornings between 6:15 a.m. through 8:00 a.m. with little traffic for the rest of the day. Needless to say, the affected residents suffer from sleep deprivation with physical impacts the next day. Another community could experience constant air traffic from 10:00 a.m. through 6:00 p.m. A reasonable person might conclude that the first community bore the more severe consequences of air traffic since the noise

Mr. Arthur Pugsley
MEPA Unit
April 22, 1999

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would come at night and the early morning against a quieter background when most people are at home and trying to sleep. In the second community, most people would be at work, out of the house, or doing activities which do not require quiet (unlike sleep). Under DNL as used by Massport, however, the first community would not appear to suffer any adverse consequences. Likewise, under Massport's definitions of dwell and persistence, the first community would not even qualify for relief. (See 5-18, 5-19 for Massport's definitions).

To an elected official in an affected community, it is beyond belief that the DEIS does not measure and discuss the amount of noise that communities may experience when there is late evening flight traffic followed by early morning flight traffic. In such situations, affected residents cannot realize a decent night's sleep. Perhaps this oversight is understandable, since such a study would show many thousands of people in the Greater Boston Area are subject to severe sleep deprivation many times during the year as a result of air traffic from Logan Airport.

A more reasonable method to determine the impact of noise upon a community should take the noise level, time of day and population density into account. If a dense community is subjected to noise which would awaken an average person during the late evenings and early mornings, large numbers of people may have their sleep affected for extended periods of time. Most people would agree that such an area would be suffering from severe environmental consequences. In the DEIS, however, Massport has not undertaken such an analysis. A realistic figure should be developed to measure the "cost" of noise, measuring the number of people affected by noise, the level of noise, and the consequences of noise (such as hours of lost sleep, inability to enjoy one's home, etc.). Such a measure should then be contrasted with the economic costs which the DEIS claims result from delays.

59.3

Since Massport has no noise monitoring devices in Somerville, it is impossible for anyone to obtain actual hard data for noise levels, especially in hilly areas, during the late evening and early morning hours to arrive at such a measure on their own. In an effort to obtain some hard data, I used a Radio Shack Sound Level Meter to take measurements at Winter Hill. Depending on the altitude of planes, I measured up to 110 dB out doors and 75dB indoors with windows closed during late night and early morning hours. This hard data confirms my personal

Mr. Arthur Pugsley
MEPA Unit
April 22, 1999

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experience and the experience of constituents suffering from this air traffic. For example, I have been awoken on numerous mornings by flights departing at 6:00 a.m. after suffering from persistent flights that occurred from after 11:00 through midnight (and even 1:00 a.m.) the prior evening. In fact, on Sunday, April 10, 1999 three flights traveled over Winter Hill from approximately 1:00 a.m. through 1:15 a.m.. The following morning, flights started at 6:15 a.m., which awoke me. The last four Sundays in a row air traffic has begun at 6:15 a.m. During the past week, I was awoken twice after 3:00 a.m. and received complaints from constituents who were also awoken. I have personally contacted the noise complaint telephone line on a number of these occasions, even Thanksgiving and Christmas morning at 6:30 a.m. Of course, Massport takes the information but provides no relief. (Copies of some notices are attached hereto as Exhibit A). Given my personal experience with noise and the experiences of my constituents, I can affirmatively state that the DEIS is totally defective in its analysis with respect to the current noise impacts on the City and elsewhere.

III. THE DEIS FAILS TO ADEQUATELY ADDRESS THE NOISE CONSEQUENCES TO THE CITY IF THE PROPOSED RUNWAY IS BUILT

Since the DEIS fails to objectively measure the current noise impacts on the City, it is impossible to reasonably evaluate the impact of the proposed expansion on the City. As discussed above, Massport relies on its general discussions of decibel levels over areas, but does not provide a realistic evaluation of the impact of the additional noise on real people in the City. Interestingly, although departures from 33L are expected to triple, and the heart of this flight pattern is over the City, (6-13), Massport does not specifically address the impact on the City from this tripling in air traffic. Instead, Massport provides charts showing increases in dwell exceedence and persistence exceedence for the various runways. (Figures 6.2-5 through 6.2-8).

59.4

These charts demonstrate that dramatic increases in dwell and persistence over the City will result from departures from 33L if the runway is constructed. There is, however, no description of the impact of the new runway on heavy late night overflights followed by heavy early morning overflights. The discussion in Part II above showed that Massport and the DEIS does not measure or address the level of late night overflights followed by heavy early morning overflights on the

Mr. Arthur Pugsley
MEPA Unit
April 22, 1999
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City. My own experience, however, demonstrates that such level is substantial during much of the year. Since 33 L is the only runway that can be used when there are severe northwest winds, if the runway is built, the City will continue to suffer from such late night overflights followed by early morning overflights when such winds predominate. But, the City will then also suffer from excessive dwell and persistence during the rest of the day resulting from the use of the new runway. A fair reading of the DEIS, however, shows that these clear noise environmental impacts to the City are not adequately addressed.

Not only is there a clear danger of severe noise environmental impacts on the City, but the remedial measures proposed by Massport are ineffective. For a community like Somerville which suffers from substantial late night followed by early morning overflights, Massport offers no soundproofing. The only remedial measure discussed in the DEIS is the projected increase in the use of Stage 3 aircraft. (6-9). However, use of stage 3 aircraft is already required during the late night and early mornings. But it is the noise from these stage 3 aircraft that currently awakens people in the City after 11:00 p.m. and after 6:00 a.m. And without actual hard data from noise measurements in places such as Winter Hill in the City, there can be no objective analysis of the noise experienced by people when these stage 3 jets are used. Unfortunately, it appears that the proposed remediation requiring the use of stage 3 jets would be nothing more than an empty palliative for the residents of the City.

59.5

59.6

IV. SUMMARY

In summary, the DEIS utterly fails to address the current impact of noise from Logan on the City, despite the fact that the City is the densest community in the Commonwealth. Likewise, the DEIS fails to address the current level of late evening followed by early morning overflights, despite the fact that this type of air traffic results in substantial sleep deprivation over extended periods of time.

Mr. Arthur Pugsley
MEPA Unit
April 22, 1999

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Lastly, the DEIS fails to address the future noise impact of the proposed runway on the City. As a result, the Secretary of Environmental Affairs should insure that the Final EIR measures and discusses these present and future noise impacts on the City as set forth herein

Very truly yours,

A handwritten signature in dark ink, appearing to read "William A. White, Jr.", with a stylized flourish at the end.

William A. White, Jr./Chairman
Committee on Housing and
Community Development



CITY OF SOMERVILLE, MASSACHUSETTS
BOARD OF ALDERMEN

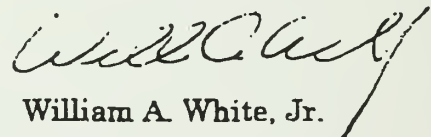
WILLIAM A. WHITE, JR.
ALDERMAN AT LARGE

Via Fax 727-1598
Mr. Arthur Pugsley
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202

Dear Mr. Pugsley:

Today I filed with your office a letter setting forth my comments to the Draft Environmental Impact Statement on the proposed expansion of Logan Airport. I inadvertently failed to attach Exhibit A to those comments. As a result, I am faxing you a copy of Exhibit A and ask that you attach it to my letter to you. Thank you for your cooperation.

Very truly yours,



William A. White, Jr.

MASSACHUSETTS PORT AUTHORITY
Noise Abatement Office
Boston-Logan International Airport
East Boston, MA 02128-2042

Aircraft Disturbance Report

Person Reporting Disturbance:

Mr. William White
16 Browning Rd.
Somerville, MA 02145

Telephone: 617-625-2600

Disturbance Date and Time: 06:42 on 11 Apr 99 to
06:42 on 11 Apr 99

Conditions:

Wind Direction:	300 deg	Wind Speed:	9 Knots
Ceiling:	25000 Ft	Visibility:	10.0 Miles

Runways in Use:

Arrivals: 33L - 33R
Departures: 33L

Complaint Description: The last aircraft last night went over at 1:30 am. It is only 6:42 am and there are more aircraft flying over already.

Massport Report of Investigation: You are affected by jet departures on Runway 33L, in use with northwesterly winds. A change of runway configuration occurred at 10:10 am.

Massport Reporter: Operations Dept.

Send Copy: Yes

cc: FAA Boston Tower Chief

EXHIBIT A

MASSACHUSETTS PORT AUTHORITY
Noise Abatement Office
Boston-Logan International Airport
East Boston, MA 02128-2042

Aircraft Disturbance Report

Person Reporting Disturbance:

Mr. William White
16 Browning Rd.
Somerville, MA 02145

Telephone: 617-625-2600

Disturbance Date and Time: 03:44 on 13 Apr 99 to
03:44 on 13 Apr 99

Conditions:

Wind Direction:	320 deg	Wind Speed:	13 Knots
Ceiling:	15000 Ft	Visibility:	10.0 Miles

Runways in Use:

Arrivals:	33L - 33R
Departures:	33L

Complaint Description: An aircraft flew over at 3:30 am. Please identify the stage. Who authorized the flight? Why not over the water?

Massport Report of Investigation: You were affected by an LR35 departure from Runway 33L. The aircraft was Stage 3 and used Runway 33L with the strong northwesterly winds. The FAA has been notified of your observations and concerns by copy of this complaint.

Massport Reporter: Operations Dept.

Send Ccopy: No

cc: FAA Boston Tower Chief

Letter 59

City of Somerville, Board of Alderman William A White Jr., Chairman, Committee on Housing and Community Development

Code	Topic 1	Topic 2	Comment	Response
59.1	Noise	Monitoring	Although the heart of the flight tracks from 33L is over the City and is located less than four miles from the end of Runway 33-L, (5-30), Massport locates no noise monitoring equipment within the City or within any reasonable distance from the City.	Requests for new noise monitors should be addressed to Massport.
59.2	Noise	Model	The Day-Night Sound Level (DNL) used by Massport is "a weighted sound level of a steady-state noise during a 24-hour day which contains the same sound exposure as does the summation of the sound exposures from all of the individual events that occur during a 24-hour period, with the provision that noises occurring at night are increased by 10dB." Without doubt, those areas with a high DNL suffer from excessive noise. But because it is a 24 hour average, the DNL understates the actual impact of noise on many affected communities such as Somerville.	For environmental sounds of all types, the EPA adopted the Day-Night Sound Level (DNL) to account for both the magnitudes and duration of the various sounds. The DNL penalizes sounds made during the nighttime (chosen in the United States to be 10 PM to 7 AM) by adding ten dB to the measured values. It is unfortunate that it is often characterized as the "average level" and therefore some people believe that it does not represent the levels of individual events. Actually, it represents the total noise exposure in a 24-hour day, including a nighttime penalty of ten dB. Thus, it accounts for all the individual sound events during the 24-hour period. EPA's review of the available case studies on the effects of environmental noise on humans found that DNL correlates better with the effects than any measure of the various individual events.
59.3	Noise	Impacts	A realistic figure should be developed to measure the "cost" of noise, measuring the number of people affected by noise, the level of noise, and the consequences of noise (such as hours of lost sleep, inability to enjoy one's home, etc.). Such a measure should then be contrasted with the economic costs which the DEIS claims result from delays.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.
59.4	Alternatives	Runway 14/32	...although departures from [Runway] 33L are expected to triple, and the heart of this flight pattern is over the City, ([Page] 6-13), Massport does not specifically address the impact on the City from this tripling in air traffic. Instead, Massport provides charts showing increases in dwell exceedence and persistence exceedence for the various runways. (Figures 6.2-5 through 6.2-8). These charts demonstrate that dramatic increases in dwell and persistence over the City will result from departures from 33L if the runway is constructed. There is, however, no description of the impact of the new runway on heavy late night overflights followed by heavy early morning overflights.	There are five jet departure tracks from Runway 33L. Of these, two tracks turn over Somerville (refer to Figure 6.2.3 of the Supplemental DEIS/FEIR). These two tracks carry less than 30 percent of the departures from Runway 33L. The increase in effective jet departures from Runway 33 over Somerville is from about 3.3 percent to 3.6 percent in the 29M Low Fleet scenario and from 2.7 percent to 3.2 percent in the 37.5M Low Fleet scenario (refer to Table 6.2-2 of the Supplemental DEIS/FEIR). This increase of about ten percent would not dramatically increase either dwell or persistence. The increases attributed to "Arr 15/Dep 33" in Figures 6.2-5 through 6.2-8 of the Supplemental DEIS/FEIR result primarily from increased arrivals on Runway 15 (refer to Table 6.2.2 of the Supplemental DEIS/FEIR). Since these arrivals do not fly over Somerville there will be little increase in noise in Somerville from the proposed changes at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
59.5	Noise	Sound Insulation	Not only is there a clear danger of severe noise environmental impacts on the City, but the remedial measures proposed by Massport are ineffective. For a community like Somerville which suffers from substantial late night followed by early morning overflights, Massport offers no soundproofing.	If the Preferred Alternative is implemented, Somerville's overflights will increase in comparison to the No-Action Alternative. However, the highest resulting noise exposure in that community is estimated to be on the order of 55 dB DNL, well beyond the 60 dB DNL contours shown in Figures 6.2-8 and 6.2-10 through 6.2-14 of the Supplemental DEIS/FEIR.
59.6	Noise	Impacts	The only remedial measure discussed in the DEIS is the projected increase in the use of Stage 3 aircraft. (6-9). However, use of Stage 3 aircraft is already required during the late night and early mornings. But it is the noise from these Stage 3 aircraft that currently awakens people in the City after 11:00 p.m. and after 6:00 a.m.	<p>The average noise of Stage 3 aircraft operating at Logan Airport is expected to decrease with time as the low bypass JT8D powered aircraft, which have been hushkitted to meet Stage 3 requirements, are retired from the fleet and replaced by the quieter new high bypass powered Stage 3 aircraft.</p> <p>The Night Equivalent Sound Level (LeqN) was calculated at 23 selected locations for all fleets and scenarios. Table 6.2.15 of the Supplemental DEIS/FEIR reports these data for the 29M Low and 37.5M High Fleet scenarios of the Supplemental DEIS/FEIR. The results show that, at most locations, the LeqN for the future fleets is lower than for the 1993 case. Where there is an increase in LeqN, the reason was the increase in flights for the No Action Alternative, which generally was mitigated by the Preferred Alternative. These results indicate that there will be less sleep disturbance in the future than that currently experienced.</p> <p>Refer to Section 7.4.1 of the Supplemental DEIS/FEIR for a discussion of cumulative noise impacts.</p> <p>In addition, Massport proposed the following noise mitigation measures:</p> <p>Runway 14/32 would be designed, constructed, and operated to handle over-water operations only (unidirectional). Massport would seek to construct Runway 14/32 to reflect unidirectional use.</p> <p>To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the <i>Logan Airport 1999 ESPR</i>. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.</p> <p>Massport has developed PRAS goals to which the FAA attempts to achieve given weather and safety conditions. Section 4.3 of the Supplemental DEIS/FEIR provides an evaluation of existing measures for monitoring PRAS achievement and demonstrates that the FAA has improved its performance relative to the PRAS goals. The Preferred Alternative mitigation program includes additional reporting requirements recommended to enhance the Massport monitoring effort.</p>



CITY OF SOMERVILLE, MASSACHUSETTS

CITY CLERKS OFFICE

WILLIAM ROCHE
ACTING MAYOR

ARTHUR McCUE
CITY CLERK

LETTER 60

Mr. Arthur Pugsley
MEPA Unit
Executive Office of
Environmental Affairs
100 Cambridge St.
Boston, MA 02202

Dear Sir:

Enclosed please find a certified copy of a Resolution unanimously adopted by the Somerville Board of Aldermen at their April 22, 1999 meeting.

Alderman-at-Large William A. White, Jr. the resolution's sponsor, also has requested that a copy of the video tape of the public hearing regarding Logan runway expansion which was held on April 13, 1999 at Somerville City Hall be forwarded to you. Accordingly both documents are included herewith.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Arthur B. McCue
City Clerk



Board of Aldermen
City of Somerville
Massachusetts

City Hall
Tel. - 625-6600

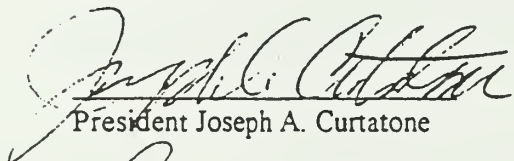
April 22, 1999

RESOLUTION

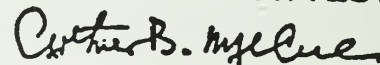
RESOLVED, That this Board of Aldermen hereby adopts the comments of Alderman William A. White Jr. on the Draft Environmental Impact Statement for Logan Airside Improvements Planning Project as set forth in the attached letter from Alderman White to Mr. Arthur Pugsley, dated April 22, 1999; AND BE IT FURTHER

RESOLVED, That this Board requests that a copy of this Resolution be sent to Mr. Pugsley for inclusion in MEPA's record.

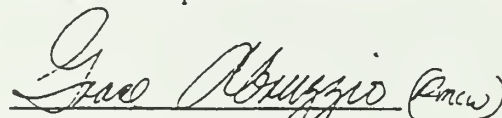
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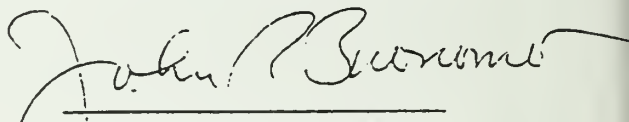

President Joseph A. Curtatone

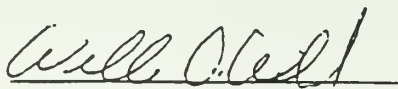
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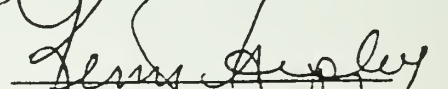


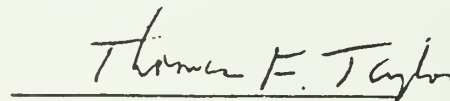
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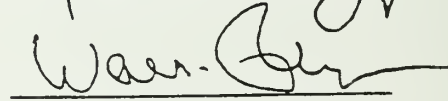

Alderman Grace A. Abruzzio

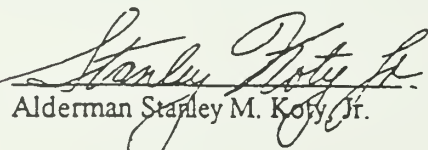

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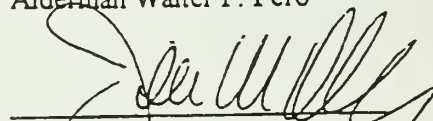

Alderman William A. White Jr.

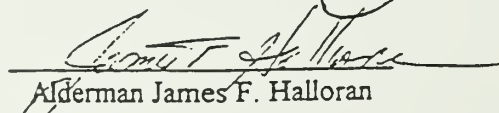

Alderman Kevin A. Tarpley


Alderman Thomas F. Taylor


Alderman Walter F. Pero


Alderman Stanley M. Kory Jr.


Alderman John M. Connolly


Alderman James F. Halloran

60.1

Letter 60

City of Somerville, City Clerk's Office

Arthur B. McCue, City Clerk

Code	Topic 1	Topic 2	Comment	Response
60.1	General Opposition			Comment noted.

TOWN OF WINTHROP

GERALD B. OGUS, Chairman
ROBERT L. DRISCOLL, JR.
MATTHEW D. LANZA

PATRICIA A. FRAZIER
Administrative Secretary



OFFICE OF THE BOARD OF SELECTMEN

TOWN HALL
WINTHROP, MA 02152-3156

TEL: 617-846-1077
FAX: 617-846-5458

LETTER 61

April 22, 1999

BY HAND (EOEA) and VIA AIRBORNE OVERNIGHT (FAA)

John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, Massachusetts 01803

Secretary of Environmental Affairs
Attention: MEPA Unit, Mr. Arthur Pugsley
100 Cambridge Street
20th Floor
Boston, Massachusetts 02202

Re: Boston, Logan International Airport
Logan Airside Improvements Project
Draft Environmental Impact Statement/
Environmental Impact Report
EOEA No. 10458

Gentlemen:

This letter provides the comments of Board of Selectmen of the Town of Winthrop, Massachusetts ("Selectmen") on the Draft Environmental Impact Statement/Report ("DEIS/R") for the above-referenced project ("Project") under the Massachusetts Environmental Policy Act ("MEPA"), the National Environmental Policy Act of 1969 ("NEPA"). It also provides the comments of the Selectmen under Section 4(f) of the Department of Transportation Act of 1966 ("4f"). Finally, it provides the comments of the Selectmen on the Notice of Project Change for the Project, submitted by the Massachusetts Port Authority ("Massport") on February 19, 1999.

The Selectmen find the DEIS/R wholly inadequate under both NEPA and MEPA. The

Selectmen urge the United States Environmental Protection Agency ("EPA") to give the DEIS/R a ranking of "Environmentally Unsatisfactory" and "Inadequate." The reasons for these findings by the Selectmen are as follows:

A. The DEIS/R completely ignores the "induced demand" issue highlighted by the EPA in its comments on the Environmental Notification Form/Scope of Work ("ENF") and required to be studied and included in the DEIS under the regulations of the Council on Environmental Quality. The Project clearly increases capacity and fosters the growth of both passenger volume and aircraft operations at Logan. Yet, the DEIS/R pretends that the Project is somehow "demand neutral." 61.1

B. As a result, virtually all of the environmental impact analyses for the Project are inaccurate because they are based on the same passenger levels for both the preferred alternative and the no-build alternative. This means that the DEIS/R significantly understates both the environmental impacts of the Project and the potential for passenger diversion of various alternatives. 61.2

C. Whole categories of impacts on Winthrop, such as land use patterns, historical and cultural resources and wetlands are ignored. 61.3

D. Several reasonable alternatives have not been included or analyzed in any meaningful way. 61.4

E. The DEIS/R ignores major impacts on 4f resources. 61.5

F. It also ignores public health issues. 61.6

G. The DEIS/R fails to meet the requirements of both MEPA and NEPA with respect to mitigation. 61.7

1. The Basic Flaw: This Project Increases Capacity and Induces Growth Rather Than Just Reducing Delays

A. Induced Demand

The stated purpose of the Project is to reduce delays at Logan. Even assuming for the sake of argument that the Project would address that problem, it is quite clear that the very existence of the Project will also induce passenger demand. The EPA stated this issue quite succinctly in its November 8, 1995 comments on the ENF for the Project:

EPA is concerned that airside and landside improvements will attract more passengers to the airport ("induced demand"), as opposed to merely

accommodating the already anticipated passengers.

The Regional Administrator, John DeVillars, echoed this theme in his November 13, 1995 comment on the ENF:

...the expected increase in passenger volume that will be accommodated by these projects will affect regional and local transportation patterns and consequently, air quality.

EPA did not raise these concerns in a regulatory vacuum. The regulations of the Council on Environmental Quality ("CEQ") for implementing NEPA require an EIS to analyze both direct and indirect effects. An "indirect effect" is defined by CEQ to include:

...growth inducing effects and other effects related to induced changes in the...growth rate, and related effects on air and water and other natural systems, including ecosystems.

40 CFR Section 1508.8 (b). Thus, it is hardly surprising that EPA was so concerned about "induced demand" in 1995. The NEPA regulations require the DEIS/R to deal with the issue.

The project proponents, Massport and the FAA, inexplicably try to pretend that this requirement does not exist. They cling to the notion that the same number of passengers will fly in and out of Logan whether or not the airside "improvements" are built, claiming that "[n]either the runway nor any other improvements associated with the... Project will induce demand by new passengers who would not otherwise come to Logan." This "demand neutral" approach flies in the face of common experience and common sense. It is well established that major regional transportation initiatives such as highways or runways induce demand. Indeed, the Boston business community and Massport have been promoting the Project in the press with the claim that Boston will lose conventions, tourists, jobs and business meetings if the Project is not built. If, for the sake of argument, one accepts these claims by Project backers, then it is quite clear that the Project will induce tourists, conventioners and business people to come to Boston, using Logan to do so.

Conversely, if the Project is not built, these same passengers will (according to the business community and Massport) avoid Boston at all costs. Thus, the no-build alternative clearly has a "negative inducement" factor. For example, the DEIS/R claims that if the Project is not built, the average delay at Logan for each takeoff and landing may well reach almost an hour. If that is the case, then the time differential between flying and taking the alternative of high speed rail between Boston and New York is virtually eliminated. Clearly, the effect of such a leveling of the transportation playing field will be to induce more Boston-New York passengers to take the train instead of the shuttle. However, the DEIS/R completely ignores this effect.. It pretends that air travel will still have a more than one hour time advantage over high speed rail (Table 2.4-5). Are Massport and the FAA seriously arguing that average delays of one hour per

61.8

flight will have no effect on Logan's passenger and operations levels? Put another way, there is little or no chance that Logan's passenger level would ever approach 45 million under the no-build scenario with average delays of almost an hour per operation.

The DEIS/R also fails to look at induced demand issue with regard to the cumulative effects of the combination of Logan 2000 landside program and the airside Project. Massport and FAA employed the same demand neutral argument with respect to the billion dollar Logan 2000 landside project.. Now Massport and FAA claim that putting a billion dollars into improving ground access, parking and terminal space at Logan (Logan 2000), contributing \$300 million to a new harbor tunnel and related highways designed to improve interstate highway access to Logan (Third Harbor Tunnel and Route 1A), and finally creating a new runway and various airside improvements (the Project), all at the same time and in the same location will have absolutely no effect on passenger demand at the airport.

It is time for Massport and the FAA to abandon that "theory." The Secretary's decision on the ENF clearly stated that the DEIS/R "should include analysis of cumulative impacts, and should clearly explain the relationship between the Logan 2000 landside program and the Airside Improvements." The EPA went further. The Regional Administrator stated that the DEIS/R would "provide the critical opportunity" (emphasis in original) to examine the synergistic or cumulative effects of Logan 2000 and the Project. The EPA comments on the ENF described the FAA's environmental review for Logan projects as "segmented." EPA was very clear in its recommendation that the DEIS needed to evaluate the possibility "that more people will drive to the airport if there is a new garage, and that more passengers will choose to fly from Logan...if Logan's capacity is increased as a result of airside improvements such as a new runway." EPA questioned the Massport and FAA position that none of the landside/airside projects would induce demand, and called for a DEIS/R that would analyze the inducement factor in a "comprehensive landside/airside" context.

The DEIS/R pays lip service to these comments by including a section entitled "Cumulative Impacts." However, it ignores the substance of the comments. In the "Cumulative Impacts" section of the DEIS/R, Massport and FAA simply return to their prior position that "[a]irside improvements ...do not relate to or affect any of the landside facilities or operations, and consequently, do not change any of the" environmental analyses. This again flies in the face of the expert opinions of the Secretary of Environmental Affairs and the EPA, as well as common experience and common sense. For example, if Massport cannot find ways to get 45 million or even 37.5 million passengers to and from Logan, then it is certainly reasonable to assume that less people will fly into and out of Logan and the need for the airside Project diminishes. Similarly, if you do not build the airside Project and, as a result, delays increase dramatically, then it is also reasonable to assume that passenger and operation levels will decrease and you may not need, for instance, the second phase of the West Garage. In short, the entire Logan package, Logan 2000 and the Project, will work together and be anything but "demand neutral." That package will induce demand; or, by its absence will cumulatively reduce demand.

The DEIS/R needs to examine all of the ramifications of the induced demand factor and its corollary, the negative inducement factor. It must examine if any airport has ever functioned with delays averaging almost one hour per flight and a ground access system that simply cannot handle the tens of millions of cars that Massport and FAA project will be headed for Logan even if Massport achieves its ambitious HOV and transit goals. It must determine how many passengers and operations such a level of delay (or anything close to it) getting to and flying out of the airport would eliminate as passengers choose other modes or perhaps avoid Boston altogether. Then, and only then, can the environmental impacts of the Project versus other alternatives, including the no-build alternative, be compared.

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2. Capacity Enhancement by Design

The demand-inducing aspects of the mere existence of the Project (and its related projects) are exacerbated by the Project's very design, which strongly suggests that it's main purpose is to provide for an increase in operational capacity at Logan rather than just addressing the current delay situation. For example, Massport and FAA claim that Runway 14/32 is designed primarily to deal with the problem of wind-related delays. However, according to the DEIS/R, such delays occur only 11% of the time. What will be the effect of using Runway 14/32 the other 89% of the time? Severe wind delays (1 runway) occur only 10 days per year. What will 14/32 be used for on the other 355 days? Runway 14/32 is designed to handle 70,000 operations per year. Do you need to handle 70,000 flights (13% of all operations) just to deal with 14/32's projected share of the delay reduction activity? It certainly seems that Runway 14/32 is designed to allow Logan to increase its overall capacity rather than to just address wind-related delays.

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The same can be said for the taxiway improvements. According to the DEIS/R, the taxiway improvements have no effect on runway-related (or wind-related) delays. Further, taxiway traffic issues are only a very small part of the delay problem. If the purpose of the Project, as stated in the DEIS/R, is "[t]o address the delay problem at Logan" then the taxiway improvements are not necessary. Clearly, the taxiway improvements are necessary and are designed to enable the project proponents to push more people and planes through Logan, not to deal with the delay problem.

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Indeed, if delays at Logan are the problem that the Project is supposedly designed to address, then it appears to be a poor solution. Even with all of the airside "improvements," the DEIS/R only projects a 30% improvement in the delay picture. What is being done about the other 70% of the problem? The Secretary's decision on the ENF recognized this incongruity. That decision required the DEIS/R to discuss delays from non-wind related conditions, such as delays started at other airports. The DEIS/R fails to meet this requirement.

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Are new runways and other airside "improvements" really the only answer to the delay problem? According to the DEIS/R, there are five airports in the U.S. which have a greater level of delay than Logan. Are those airports proposing new runways and taxiway improvements?

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The DEIS/R does not tell us. Are those airports addressing their more severe delay problems with other alternatives? Again the DEIS/R is silent. Are the cities that experience more delay than Logan suffering from a lack of tourist, convention and business travel? The reader of the DEIS/R is not provided with such information, but he or she is told that such will be the fate of Boston if the Project is not built.

If wind-related delay reduction is not the major goal of the Project, then what is? Note that Logan ranks 6th in delays and 11th in operations, but only 17th in passenger volume. Clearly, delays are not attributable to the crush of tourists, conventioners and businesspeople that the Project's backers insist will disappear if the Project is not built. If that were the case, then the passenger volume ranking would not be so low. These rankings suggest that the real problem which the Project is aimed at may be the crush of small commuter and shuttle flights which cause the high operations to passenger ranking ratio.

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Thus, the Project appears to be anything but "demand neutral." Its very existence in isolation would induce demand by virtue of the fact that it will make air travel from Logan significantly more attractive than it would be absent the Project. That inducement is compounded by the synergy of the Project with the Logan 2000 landside improvements and the Third Harbor Tunnel, which allow passengers to get to and from the flights that the airside "improvements" will accommodate. The Project is also designed to accommodate, handle and thus induce much more than air traffic affected by wind-related delays. It is designed to enable Logan's managers to pump an ever-increasing amount of operations through the airport. That is the only way that the demand projections for the year 2010 can be met.

2. The Project's Environmental Impacts are Understated

A. Fleet and Passenger Levels Cannot be the Same for All Alternatives

Once one acknowledges the fact that the Project is not "demand neutral," but instead represents a powerful engine for accommodating and inducing the growth of operations at Logan, it is clear that environmental analyses in the DEIS/R for every medium or pollutant significantly understate the impacts of the Project. This stems from the fact that the DEIS/R assumes that the Project will have absolutely no impact on demand at Logan and therefore applies the same fleet and passenger levels to each alternative analyzed, including the no build alternative. With this simplistic approach (questioned by both the EPA and EOE), Massport and FAA can claim that the Project will produce environmental "benefits." These "benefits" stem from the fact that if fleet and passenger levels are equal for every alternative, then the preferred alternative will always move that equal number of planes and passengers through the airport more quickly and thus more cleanly. The aircraft will move beyond the relevant airshed, noiseshed, etc. more rapidly, thereby "reducing" impacts. However, alternatives 2, 3 and 4 (all of which exclude the new runway and two of which exclude all of the physical "improvements") should not be compared to the preferred alternative at the same fleet and passenger levels. This is because, as demonstrated above, the very "efficiency" of the preferred alternative. and the

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delays associated with the "inefficiencies" of alternatives 2, 3 and 4 would change the demand levels (and thus the fleet and passenger levels) at any point in time.

Take for example the impact on Court Road residences in Winthrop from taxiway noise. Under alternative 1A (the preferred alternative) a certain level of passengers and operations will produce a level of impact. That level should be greater than the level produced under alternative 4 (the true "no build" alternative) at any given time because under alternative 4 there should be less demand for air travel and thus less passengers and operations. The DEIS/R, however, ignores the induced demand and capacity enhancement attributes of the preferred alternative and simply assumes that the same number of people will fly into and out of Logan under alternatives 1A and 4, even as delays approach one hour for each operation as projected under alternative 4. The result is that both the alleged environmental "advantage" of the preferred alternative and the environmental impacts of alternative 4 are overstated.

B. Even Without the Induced Demand Factor, Impacts are Ignored or Miscalculated

(i). Noise

Noise is a particularly troublesome factor for Winthrop. The DEIS/R presents a confusing and often inconsistent picture of the Project's noise impacts. This approach fails to meet MEPA/NEPA standards as well as certain specific requirements of the comments and decision on the ENF.

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The noise data and the conclusions derived therefrom in the DEIS/R are flawed. Massport continues to employ its computer noise models even when it knows that the models understate actual noise, especially in Winthrop. For example, the DEIS/R utilizes noise data for 1993 from the models when actual, real life data from noise monitors is available which shows higher noise levels.

Why does the DEIS/R utilize 1993 as the noise baseline year? That year featured the highest number of operations until last year, the highest delay ranking in Logan's history, a lower percentage of Stage 3 aircraft in the fleet than you would find in subsequent years, and in 1993 the INM model had not yet been corrected to cure the understatement of noise. In short, 1993 seems to be a fairly "dirty" and inaccurate baseline choice. Its use may overstate the alleged "improvements" from the Project.

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A basic premise of the DEIS/R is that without the airside "improvements" Logan will become a "north-south" airport. Winthrop is to the east of Logan. Presumably, Winthrop would be a candidate for more noise with the "improvements." Yet the DEIS/R purports to demonstrate that Winthrop gets less noise with the Project. That does not make sense.

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Ground taxi noise is a particular problem for Winthrop residents, especially at Court Road. Indeed, the DEIS/R shows that the highest level of ground taxi noise is found at Court

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Road, from aircraft taxiing to the 22 runways for departure. How then, can Massport and FAA claim that a centerfield taxiway which brings more planes per hour to the 22s for departure somehow reduces noise on Court Road? The answer should not be just "increased efficiency" because the data show that even with all of the airside improvements delays will increase by a factor 1.4.

The Secretary's decision on the ENF specifically requested that the DEIS/R should include the 60 dB contour. This is important for Winthrop and many other communities since the DEIS/R acknowledges that the population within the 65 dB contour actually goes up with the addition of the airside "improvements." Naturally, one wonders if the same is true for the 60 dB contour. It is. While the DEIS/R does not include the 60 dB contours throughout the main text, hidden away in Appendix L, Table 1.1 is data demonstrating that the population exposed to 60 dB with the airside "improvements" goes up in every fleet scenario.

Even utilizing Massport/FAA's flawed assumption that the Project has nothing to do with demand and passenger levels, it is clear that the airside "improvements" do not deliver the promised noise benefits for portions of Winthrop. The important "night time equivalent" sound level values go up in Winthrop in the 29 million low fleet scenario at 4 out of 5 monitoring locations when you add Runway 14/32. In the 37.5 million low fleet scenario, adding 14/32 makes these values go up at 2 out of the 5 locations in Winthrop. Similarly, sound from ground operations increases in Winthrop with the addition of airside "improvements." At both the Somerset and Johnson as well as the Loring and Court Road locations noise goes up with the "improvements" versus the no action alternative.

(ii). Air/Odor Pollution

Massport and FAA do not seem to have taken EPA's comments on the air pollution issue seriously. EPA called for an inventory of total air toxics. Where is it? EPA requested a combination of all landside and airside emissions. It is difficult to determine if that analysis is included in the DEIS/R.

The issue of the Project's conformity with the federal Clean Air Act is an important one. As with the issue of demand and cumulative impacts, Massport and FAA simply assume the issue away. They come to the rather tortured conclusion that no Conformity Determination is required under the Clean Air Act, even though emissions go up for just about every category of pollutant if the Project is built. Their "reasoning," once again, is that the preferred alternative results in an alleged "reduction" of air pollutants when compared to the no action alternatives at the same fleet and passenger levels. Such reasoning, as demonstrated above, completely ignores the induced demand issue and the cumulative effects issue that EPA noted. It further ignores the simple common sense argument that it is highly unlikely (if not impossible) that anything close to 45 million or even 37.5 million passengers will utilize Logan if delays for each takeoff and landing average about an hour and ground access is a nightmarish experience.

The Massport and FAA "theory" that the Project does not require a Conformity Determination is simply asserted in the DEIS/R without any citation or reference to provisions of the Clean Air Act, its implementing regulations or case law that allow such a conclusion. The fact is that the Project will cause emissions to go up. One such emission is NO x. NO x is one of the precursors of ozone. Massachusetts is a "serious non-attainment" state for ozone under the Clean Air Act, as noted by Administrator DeVillars in his comments on the ENF. The Project will allow or accommodate ever-increasing numbers of Stage 3 aircraft to fly into and out of Logan. Stage 3 aircraft, while quieter, produce more NO x than the noisier planes that they are replacing. Therefore, it is clear that the Project will have a decidedly negative effect on the Commonwealth's ability to meet Clean Air Act requirements. A Conformity Determination should certainly be required. The "theory" in the DEIS/R used to avoid such a Determination finds little support in the facts and the DEIS/R provides no legal support for such a position.

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The DEIS/R goes on at great length to make the case that delays at Logan are extremely costly. However, it is silent on the economic impact of the failure of Massachusetts to achieve required results under the Clean Air Act. Such costs could be astronomical. Failure to achieve the requirements of the Act can result in the loss of federal highway funds. Given the cost of the Central Artery, what would be the impact of such a loss on the Massachusetts economy? Logan is one of the largest generators of pollution in Massachusetts. If Logan helps to trigger a failure to achieve Clean Air Act goals, what will be the costs in terms of added air pollution requirements for private stationary sources, such as utilities and factories? Will businesses relocate because tougher air pollution standards imposed on them as a result of emissions emanating from Logan?

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The dispersion model results do not seem to conform to the inventory model results. For example, at the 37.5 million low fleet scenario, 3 out of the 8 pollutants in 2010 for the true no-build alternative are either less than or the same as the results for the preferred alternative. The same holds true for the 37.5 million high fleet scenario in 2010. For the 45 million high fleet scenario, a full half (4/8) of the pollutants measured are less for the true no-build alternative than they are for the preferred alternative. These results draw into question the argument in the DEIS/R that the "efficiency" of the preferred alternative provides clear air pollution benefits over no-build alternatives.

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Finally, the discussion in the DEIS/R of the dispersion modeling results is completely disingenuous and casts further doubt about the air pollution conclusions in the DEIS/R. When the results show that the preferred alternative has a slight advantage over the no-action alternative, the DEIS/R proclaims that the "the lowest levels occur in association with" the preferred alternative. However, when, as noted above, the results show that the no-action alternative has virtually the same advantage over the preferred alternative, the DEIS/R comes to the very different conclusion that "there will be no detectable differences in air quality impacts among the four alternatives," or "there is no significant difference." This lack of consistency in analysis draws into question the conclusions of the DEIS/R. Is it an advocacy document or an impartial environmental disclosure document?

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(iii). Land Use

Both MEPA and NEPA require the DEIR/S to discuss impacts on land use. The CEQ regulations implementing NEPA are quite specific on this requirement. They provide that an environmental impact statement "shall include discussions of:

- (c) possible conflicts between the proposed action and the objectives of... local...land use plans, policies and controls for the area concerned...(g) Urban quality, historic and cultural resources, and the design of the built environment...

40 CFR Section 1502.16 (emphasis added).

There can be no doubt that Winthrop is part of the "area concerned." There can also be no doubt that Winthrop's "built environment," "urban quality," and "historic and cultural resources are heavily impacted by the airport and will be affected by the Project. Indeed, part of the airport lies within Winthrop. Major runways are located only a stone's throw from Winthrop residential neighborhoods and from the Belle Isle Marsh, an important historic and cultural resource. The overflights from Logan have had a considerable impact on land use and land values in certain parts of Winthrop. Airport-related noise and air pollution impacts have helped to shape the "built environment" and "urban quality" of such neighborhoods. A school building listed on the National Register of Historic Places is either in or quite near to the 65 dB contour, as is a park. The use and enjoyment of one of Winthrop's greatest resources, the beach, is heavily impacted by noise from aircraft.

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Yet, the DEIS/R includes the rather astonishing statement that the airside improvements will "not alter existing land use patterns." This is preposterous. Airport development and expansion have already had a major effect on land use in Winthrop. Further expansion associated with the Project will definitely impact land use patterns in Winthrop.

The DEIS/R must explore this. At a minimum it should look into the land use impacts on Winthrop brought about historically by Logan development and passenger growth. That historical experience should be utilized to develop a picture of what impacted portions of Winthrop will be like in 2010 at various passenger and fleet scenarios.

(iv). Wetlands/wildlife habitat/waterways

The DEIS/R claims that the project is not within any wetlands resource area. However, it also states that the Project will need an Order of Conditions from the Boston Conservation Commission. Obviously, then, there is at least a presumption of impact on a resource area. Such impacts need to be discussed.

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There is no mention in the DEIS/R of the possibility that the Project would require an

Order of Conditions from the Winthrop Conservation Commission. Clearly the Project will have an impact on wetlands areas in Winthrop. Noise and exhaust pollution will impact on Belle Isle Marsh. Runoff and outflow increases from new taxiways may wash up on Winthrop shores. These issues should be discussed in the DEIS/R.

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The DEIS/R discusses the issue of the Upland Sandpiper nesting areas, but not in the context of the wildlife habitat portion of the Wetlands Protection Act

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The Project is planned to be constructed on filled tidelands or waterways. It represents a significant expansion of structure on existing fill. The DEIS/R does not discuss any possible need for a Chapter 91 license and/or compliance with the Rivers and Harbors Act or the Clean Water Act.

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(v). 4f/Article 97

While historic resources in Chelsea are discussed, as noted above, impacted historic and cultural resources in Winthrop are ignored. We note further that the DEIS/R summarily dismisses the acknowledged impacts on historic buildings in Chelsea with the proposed soundproofing of the historic residences affected. Soundproofing is a "band aid" approach. It does not fully mitigate the impacts of repeated noise assaults from jet aircraft. It is quite useless during warm weather when windows will be open and it does nothing for sound impacts outside of the building. It hardly represents all feasible mitigation measures.

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While the DEIS/R correctly points out that the legislation creating the Boston Harbor Islands park reservation may have exempted the islands from the provisions of 4f, the quoted legislation does not exempt the park reservation from MEPA and NEPA. In short, just because Congress saw fit to eliminate the Harbor Islands park area as a potential resources for purposes of 4f litigation in connection with airport activities, it does not mean that Congress meant that the environmental impacts on the islands from airport expansion should be ignored for MEPA and NEPA purposes. The Project will clearly have a major impact on the Harbor Islands parkland. It will create major noise problems for those making use of the islands and change the entire experience of anyone exploring the Harbor Islands. Such impacts need to be discussed and analyzed.

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Further, while federal legislation may have exempted the Harbor Islands from 4f litigation, it did not explicitly exempt the Islands for Article 97 purposes. The possible applicability of Article 97 of the Massachusetts Constitution should be explored in the DEIS/R.

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(vi). PRAS benefits

The DEIS/R makes much of the assertion that the Project will enable Massport and the FAA to better achieve PRAS goals. Assuming, for the sake of argument, that this proposition is true, the DEIS/R should take into account the fact that the PRAS goals are almost 20 years old.

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The world has changed a great deal in 20 years. Achievement of the PRAS goals should not, then, be deemed such a terrific benefit automatically. The DEIS/R should discuss whether or not the PRAS goals need revision in order to actually maximize environmental benefits.

61.37
(cont.)

It is also unclear from the DEIS/R just how much compliance with PRAS goals the Project might actually produce. The data in the DEIS/R is all over the map. For some runways the no-action alternative actually results in better PRAS compliance when compared to the preferred alternative. These discrepancies should be laid out and discussed fully in the DEIS/R.

61.38

(vii). Public health

Public health issues relating to airport activity remain a major concern in Winthrop and in other "close-in" communities. Massport was required to present public health issues in its GEIR process for Logan 2000. The result was far from adequate. It was mostly a recitation of Massport monitoring meetings convened by other agencies. The Department of Public Health commented that Massport's presentation was not particularly useful or accurate.

The DEIS/R fails to advance the inquiry into airport-related public health issues. The Project will clearly enhance capacity at Logan and thus increase noise and emissions. According to the report of the Natural Resources Defense Council, Flying Off Course (NRDC 1996), a 1993 EPA study (EPA, Estimation and Evaluation of Cancer Risks Attributable to Air Pollution in Southwest Chicago) ranked aircraft engine emissions ahead of steel mills, hazardous waste treatment plants and other industrial facilities as a potential health hazard. That study concluded that aircraft engines are responsible for 10.5% of the cancer cases in southwest Chicago caused by toxic air pollution. It noted that "it is no surprise that emissions from aircraft engines may have a significant impact on the people living in the study area, especially to people living at receptors adjacent to the airport." The NRDC report also notes that the United Nations is concerned about NO_x emissions from airplanes and has considered tightening international controls.

61.39

The DEIS/R should note these studies, update them and present a comprehensive review of what is known about the health effects of airport noise and emissions. Massport and the FAA should work closely with Massachusetts and federal health agencies to address the legitimate health concerns of Winthrop residents who are exposed to potentially harmful emissions. Since the Project will increase those emissions, the DEIS/R must deal with this subject. Massport failed to do so adequately in the GEIR. It is time address the issue properly.

3. Reasonable Alternatives are Not Considered

When Massport's Executive Director came to Winthrop prior to the publication of the DEIS/R to discuss the Project, he was asked if Massport had any alternatives to the proposed Project. His rather surprising answer was quite simply, "No." In other words. Massport had already made up its mind that the Project was the only possible way to address air transportation

in the Boston area. Before the Executive Director had even seen the impacts of the Project, he had already made up his mind that there were no viable alternatives.

Such a statement flies in the face of the purposes of MEPA and NEPA. It is not surprising, then, that the DEIS/R ignores several reasonable alternatives. Rather than discussing and comparing such alternatives, the entire alternatives discussion in the DEIS/R centers on various combinations of airside "improvements" and the no-build alternative. It neglects true alternatives to the Project.

61.40

Two such alternatives involve other airports. There is no discussion in the DEIS/R about a second major airport. Given the ground access and other constraints confronting Logan, a second airport is clearly an option that is worth consideration. It is also clearly reasonable, since second airports have been employed with success in other situations similar to Boston. Dulles Airport in Washington is an example.

Another airport alternative ignored by the DEIS/R is Hanscom Field. This facility is owned by Massport, has adequate runways, is convenient to Boston and is underutilized. The DEIS/R does not explore the possibility of opening up Hanscom to commercial passenger and/or freight traffic. It does not discuss the fact that Federal Express once operated out of Hanscom or that the Hanscom Master Plan, agreed to by the surrounding towns, allows for an increase in operations over the current level. It also fails to acknowledge that many of the so-called "operations" at Hanscom are "touch and go" training exercises where each "touch" and each "go" is considered a separate operation, thus greatly inflating the operational level at Hanscom.

61.41

Another alternative is that of stopping the proposed centerfield taxiway at Runway 15/33. This alternative would greatly reduce taxiway noise and pollution for Winthrop residents. It is not even mentioned in the DEIS/R.

61.42

The DEIS/R makes an attempt at discussing "support" for other transportation modes which can divert air passenger traffic from Logan, but on close inspection the discussion reveals a complete lack of effort in this regard. Most of the studies that are cited in the DEIS are several years old. Massport's participation in reviews of projects such as high speed rail, the North Station-South Station Rail Link ("NSRL") and others consists of simply sending a low-level official to attend meetings and keep a seat warm. The DEIS/R should explore real participation by Massport in promoting projects like high speed rail and the NSRL, including the expenditure of funds. The DEIS/R claims that Massport lacks jurisdiction to get involved in such matters. However, Massport has found the "jurisdiction" when it so desires to spend funds on rail infrastructure to Fort Devens, running a bus public transit operation (Logan Express), building highways (\$300 million for the Artery/Tunnel project) and advertising to promote Logan Express and other alternative means for ground access to the airport. Why is Massport incapable of promoting and spending money on alternatives to the Project such as high speed rail to New York and Portland, the NSRL and better highway access to the Worcester Airport?

61.43

California and many European countries utilize the Community Noise Equivalent Level ("CNEL") instead of the DNL. The DSEIS/R should present CNEL data.

61.44

Massport and FAA refuse to even consider applying for curfews under the Airport Noise and Capacity Act of 1990. While such an application may be fraught with difficulty, it is still legally available and thus still a reasonable alternative.

61.45

4. Concrete Mitigation Measures are Missing

The MEPA regulations require the DEIS/R to contain Section 61 findings. The document does not meet this requirement. Mitigation commitments are sorely lacking.

61.46

As noted above, soundproofing is not adequate mitigation. It is a "band aid" approach which is completely ineffective for much of the year and totally ineffective outside of a soundproofed building. Yet, the DEIS/R notes repeatedly that soundproofing is the mitigation answer to all noise problems.

61.47

Massport has had years to deal with the Upland Sandpiper habitat problem. Instead of coming up with a plan for mitigation that can be reviewed in the DEIS/R, the document just notes that Massport is working with another state agency to develop options. That is not good enough.

61.48

The DEIS/R assumes that Runway 14/32 will be "unidirectional" only. However, it does not provide any detailed discussion as to how that restriction will be put in place and maintained over time. Indeed, the DEIS/R simply recites that FAA "policy" will keep 14/32 unidirectional. Policies come and go.

61.49

5. Notice of Project Change

Massport filed a Notice of Project Change on February 16, 1999. The Selectmen support a Notice of Project Change and urge that the Secretary require Massport to refile the ENF and recommence the EIR process. More than three years have elapsed between the filing of the ENF and the publication of the DEIS/R. That gap has created significant environmental and procedural consequences that require additional analysis.

First, the ENF for this Project was not a typical ENF filing. It was a detailed scope of work that contained a great deal of environmental analysis which truly structures and defines the DEIS/R. It triggered a tremendous amount of controversy and comment. The Certificate of the Secretary was not a simple determination that an EIR was required. It was an 8-page document that was based on the information and analysis contained in the ENF and the issues raised by the comments. All of that information, analysis and commentary is now "stale." The general public has long forgotten the information and analysis set forth in the ENF. The public is entitled to have the benefit of a fresh ENF.

Obviously, the world of Logan has changed over the last three years. For example, in 1995 (a year for which results may have been available for purposes of the 1996 ENF) Logan's delay ranking was 8th in the U.S. That is considerably different from the 1997 ranking that the DEIS/R emphasizes. Passengers and operations have increased significantly. Projections from the GEIR process for passengers and operations which formed the basis of much of the ENF analysis have been shown to be inaccurate over time and have been revised. In short, the facts presented and debated at the time of the ENF and which formed the basis of the 8-page scoping decision have changed.

Other factors have changed as well. High speed rail will come to Boston this year. Boston-Portland rail service is soon to be a reality. Green and Manchester airports have expanded tremendously. Highway improvements to Worcester are underway. All of these changes suggest a different scope and a different EIR.

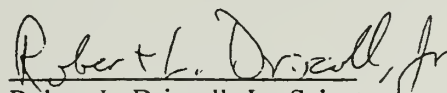
Environmental issues have also changed. For example, ozone concerns have become more pronounced. Administrator DeVillars in his comments on the ENF noted that the EIR was to be published in approximately 18 months and he pointed out that during that time there will be an increase in "overall airport-related emissions." That increase has now gone on for more than twice the projected time period, doubling Mr. DeVillar's concerns.

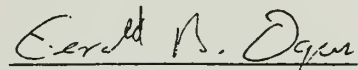
The EPA also stressed concerns about funding. Mr. DeVillars pointed out that the Project was competing for funds with other transportation projects, which may have air quality benefits. That funding pool has dramatically shrunk over the last three years as a result of the combination of the escalation of Central Artery costs and reduced overall federal funding.

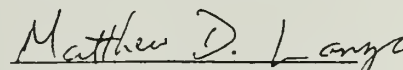
Accordingly, the Secretary should determine that things have changed and the ENF process must be repeated.

For all of the foregoing reasons, the DEIS/R must be deemed inadequate.

Sincerely,

 (NSG)
Robert L. Driscoll, Jr., Selectman

 (NSG)
Gerald B. Ogus, Selectman

 (NSG)
Matthew D. Lanza, Selectman

cc: Senator Kennedy
Senator Kerry
Congressman Markey
Congressman Moakley
Congressman Capuano
Administrator Jane Garvey
Administrator John DeVillars
Representative DeLeo
Senator Travaglini
Mayor Menino
Winthrop Airport Hazards Committee
CARE
CAC
Anastasia Lyman

Letter 61

Town of Winthrop, Board of Selectmen

Robert L. Driscoll Jr., Selectman

Code	Topic 1	Topic 2	Comment	Response
61.1	Analysis Assumptions	Passenger Forecasts	The DEIS/R completely ignores the "induced demand" issue highlighted by the EPA in its comments on the Environmental Notification Form/ Scope of Work ("ENF") and required to be studied and included in the DEIS under the regulations of the Council on Environmental Quality. The Project clearly increases capacity and fosters the growth of both passenger volume and aircraft operations at Logan. Yet, the DEIS/R pretends that the Project is somehow "demand neutral."	<p>The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce delays that occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in future passenger and aircraft activity at Logan Airport. The environmental impacts associated with these alternative forecasts have been evaluated in the Logan Airport Airside analysis and GEIRs.</p>

Code	Topic 1	Topic 2	Comment	Response
61.2	Analysis Assumptions	Passenger Forecasts	...[V]irtually all of the environmental impact analyses for the Project are inaccurate because they are based on the same passenger levels for both the Preferred Alternative and the no-build alternative. This means that the DEIS/R significantly understates both the environmental impacts of the Project and the potential for passenger diversion of various alternatives.	<p>The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The analysis in the SDEIS/FEIR includes diversions.</p> <p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives. Massport disagrees that its record in diverting traffic to other airports is unsuccessful. Since 1996 eight out of ten new passengers in New England were directed to regional airports, which include T.F. Green/Providence, Worcester Regional, and Manchester airports. In 1999, Massport estimates that regional airports attracted 2.4 million passengers, that would have otherwise used Logan Airport.</p>
61.3	Environmental Review Process	MEPA	Whole categories of impacts on Winthrop, such as land use patterns, historical and cultural resources and wetlands are ignored.	<p>The FAA and Massport have consulted with the Massachusetts Historical Commission (MHC). The MHC has concurred with the FAA's determination that the Preferred Alternative will have no adverse effect on significant historic properties. Refer to Section 6.3.2 of the Supplemental DEIS/FEIR for a description of historic properties, project impacts and mitigation.</p> <p>As described in Sections 6.3 and 6.5 of the SDEIS/FEIR, no impacts to land use or wetlands would result from the Preferred Alternative.</p>

Code	Topic 1	Topic 2	Comment	Response
61.4	Environmental Review Process	MEPA	Several reasonable alternatives have not been included or analyzed in any meaningful way.	<p>The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i>, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i>. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i>, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.</p>
61.5	Open Space/ Parkland	Section 4(f)	The DEIS/R ignores major impacts on 4f resources.	<p>The proposed improvements at Logan Airport will neither incorporate land from the Section 4(f) resource nor affect the normal activity or aesthetic value of a public park, recreation area, wildlife refuge, or historic site. Therefore, the Preferred Alternative does not constitute a use of Section 4(f) resources. In addition, the FAA has determined that there are no feasible or prudent alternatives to the Preferred Alternative that would achieve the delay reduction, safety, transportation, noise distribution, and other objectives of the Preferred Alternative. Therefore, even if the noise levels associated with the Preferred Alternative were determined to interfere with the normal activity associated with the identified Section 4(f) resources (which they do not), the FAA concludes that the sound insulation mitigation proposed for the affected Section 4(f) structures includes all possible planning to minimize harm from that increase in noise.</p> <p>The Massachusetts Historical Commission (MHC) has concurred that the Proposed Project will have no adverse effect on significant historic properties (MHC letter to FAA, December 21, 1999 Sections 6.3.2 and 6.3.3 of the Supplemental DEIS/FEIR provide a summary of Section 4(f) resources within the project area.</p>
61.6	Public Health	Effects	The DEIS/R ignores public health issues.	<p>Massport has provided the City of Boston and public health agencies with air quality and emissions data.</p> <p>In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 <i>Report to the Mayor, Health of Boston</i> prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the <i>Soot Deposition Study</i> with public health agencies and is cooperating with the Harvard School of Public Health on the <i>South Boston Particle Source Apportionment Study</i>.</p> <p>Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
61.7	Environmental Review Process	FAA/NEPA MEPA	The DEIS/R fails to meet the requirements of both MEPA and NEPA with respect to mitigation.	<p>Mitigation is addressed in detail in Chapter 8 of the Supplemental DEIS/FEIR</p> <p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. Chapter 8 of this Supplemental Draft EIS/FEIR outlines Massport's mitigation commitments associated with the Airside Improvements Planning Project.</p>

Code	Topic 1	Topic 2	Comment	Response
61.8	Analysis Assumptions	Passenger Forecasts	<p>It is well established that major regional transportation initiatives such as highways or runways induce demand. Indeed, the Boston business community and Massport have been promoting the Project in the press with the claim that Boston will lose conventions, tourists, jobs and business meetings if the Project is not built. If...one accepts these claims by Project backers, then it is quite clear that the Project will induce tourists, conventioners and business people to come to Boston, using Logan to do so. Conversely, if the Project is not built, these same passengers will (according to the business community and Massport) avoid Boston at all costs. Thus, the no-build alternative clearly has a "negative inducement" factor. For example, the DEIS/R claims that if the Project is not built, the average delay at Logan for each takeoff and landing may well reach almost an hour. If that is the case, then the time differential between flying and taking the alternative of high speed rail between Boston and New York is virtually eliminated. Clearly, the effect of such a leveling of the transportation playing field will be to induce more Boston-New York passengers to take the train instead of the shuttle. However, the DEIS/R completely ignores this effect. There is little or no chance that Logan's passenger level would ever approach 45 million under the no-build scenario with average delays of almost an hour per operation.</p>	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p>
61.9	Analysis Assumptions	Passenger Forecasts	<p>The DEIS/R also fails to look at induced demand issue with regard to the cumulative effects of the combination of Logan 2000 landside program and the Airside Project. Massport and FAA claim that putting a billion dollars into improving ground access, parking and terminal space at Logan (Logan 2000), contributing \$300 million to a new harbor tunnel and related highways designed to improve interstate highway access to Logan (Third Harbor Tunnel and Route 1A), and finally creating a new runway and various airside improvements (the Project), all at the same time and in the same location will have absolutely no effect on passenger demand at the airport. The Secretary's decision on the ENF clearly stated that the DEIS/R "should include analysis of cumulative impacts, and should clearly explain the relationship between the Logan 2000 landside program and the Airside improvements." The EPA Regional Administrator stated that the DEIS/R would "provide the critical opportunity" (emphasis in original) to examine the synergistic or cumulative effects of Logan 2000 and the Project. The EPA comments on the ENF described the FAA's environmental review for Logan projects as "segmented." ... The DEIS/R ignores the substance of the comments. ... The entire Logan package, Logan 2000 and the Project, will work together and be anything but "demand neutral." That package will induce demand; or, by its absence will cumulatively reduce demand.</p>	<p>The proposed improvements analyzed in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR involve both construction and administrative actions that will facilitate aircraft operations (landings, takeoffs and taxiing). None of the improvements involve landside facility improvements (e.g., terminals and roadways) or related operations. The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze in detail the impacts from aircraft operations, including extensive analysis of noise and air quality impacts during the years 1993, 1998 and under future forecast scenarios as well as environmental benefits from certain of the improvement concepts under review. In this respect, the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR conform with scoping directives from the lead federal agency (the FAA) and with applicable FAA environmental orders, all issued in accordance with NEPA, and with directives from EOEPA issued under MEPA. The various GEIR documents, including the most recent <i>Logan Airport 1998 Annual Update</i> and the <i>1999 ESPR</i>, provide additional analytic context by examining cumulative impacts from airside (i.e., aircraft) operations and landside (e.g., vehicular traffic, terminal service vehicles) operations at Logan Airport as well as Massport's comprehensive mitigation program. The GEIR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR as a background document. Each GEIR submission is subject to public review and comment. The <i>Logan Airport 1998 Annual Update</i> and the <i>1999 ESPR</i> analyses are based on the same forecast levels used in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. The GEIR informs Massport's planning process for all the improvements at Logan Airport, including the improvements under review in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. The GEIR is specifically referenced in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. These documents also discuss the relationship of the GEIR/ESPR analysis to the Airside Project analysis. Consistent with past practice, Massport expects that the FAA will take the GEIR/ESPR analysis into account during its deliberations and ultimate decision on the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
61.10	Analysis Assumptions	Passenger Forecasts	The DEIS/R needs to examine all of the ramifications of the induced demand factor and its corollary, the negative inducement factor. It must examine if any airport has ever functioned with delays averaging almost one hour per flight and a ground access system that simply cannot handle the tens of millions of cars that Massport and FAA project will be headed for Logan even if Massport achieves its ambitious HOV and transit goals. It must determine how many passengers and operations such a level of delay (or anything close to it) getting to and flying out of the airport would eliminate as passengers choose other modes or perhaps avoid Boston altogether.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPR</i> and its updates.
61.11	Purpose and Need	Delays	The Project's design strongly suggests that its main purpose is to provide for an increase in operational capacity at Logan rather than just addressing the current delay situation. For example, Massport and FAA claim that Runway 14/32 is designed primarily to deal with the problem of wind-related delays. However, according to the DEIS/R, such delays occur only 11% of the time. What will be the effect of using Runway 14/32 the other 89% of the time? Severe wind delays (1 runway) occur only 10 days per year. What will 14/32 be used for on the other 355 days? Runway 14/32 is designed to handle 70,000 operations per year. Do you need to handle 70,000 flights (13% of all operations) just to deal with 14/32's projected share of the delay reduction activity? It certainly seems that Runway 14/32 is designed to allow Logan to increase its overall capacity rather than to just address wind-related delays.	<p>Implementation of the recommended Airside Project, specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport.</p> <p>The runway would substantially reduce the delays that now occur during northwest wind conditions. Preventing these delays would represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable, and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred without the runway. Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in current and future passenger and aircraft activity at Logan Airport.</p>
61.12	Purpose and Need	Delays	According to the DEIS/R, the taxiway improvements have no effect on runway-related (or wind-related) delays. Further, taxiway traffic issues are only a very small part of the delay problem. If the purpose of the Project, as stated in the DEIS/R, is "[t]o address the delay problem at Logan" then the taxiway improvements are not necessary. Clearly, the taxiway improvements are necessary and are designed to enable the project proponents to push more people and planes through Logan, not to deal with the delay problem.	While taxiway delays are much lower than runway delays, the taxiway improvements will provide 15,000 to 21,000 annual hours of delay reduction in future scenarios. Just as importantly, the taxiway improvements will increase airfield safety and operational efficiency. Finally, by decreasing ground delays, these improvements will also result in small reductions in noise and air quality impacts of the airfield.

Letter 61: Town of Winthrop, Board of Selectmen
Robert L. Driscoll, Jr., Selectman

Code	Topic 1	Topic 2	Comment	Response
61.15	Purpose and Need	Delays	Note that Logan ranks 6th in delays and 11th in operations, but only 17th in passenger volume. Clearly, delays are not attributable to the crush of tourists, conventioners and businesspeople that the Project's backers insist will disappear if the Project is not built. If that were the case, then the passenger volume ranking would not be so low. These rankings suggest that the real problem which the Project is aimed at may be the crush of small commuter and shuttle flights which cause the high operations to passenger ranking ratio.	The delay measures and Massport's modeling both show that Logan Airport continues to suffer from serious airside delays despite the regional carrier consolidation and the decline in regional carrier operations. Regional carrier consolidation did not substantially reduce delays at Logan Airport because airline overscheduling is not a significant cause of delays at Logan Airport. As the Airside Project analysis shows, the lack of a three-runway configuration to handle arriving flights during periods of northwest winds is a major source of Logan Airport delays. Furthermore, the impact of regional carrier consolidation on future delay levels was explicitly examined through the analysis of several future "Low" fleet scenarios, which assume that commuter aircraft comprise a smaller share of Logan Airport's fleet compared to the "High" fleet scenario (new fleet, incorporating a significant proportion of regional jets was also analyzed). Even future Low fleet scenarios show significant levels of delays at Logan Airport. Based on actual experience and the Airside Project modeling, further regional carrier consolidation is not expected to have a significant impact on delay levels in Low fleet conditions. In high fleet conditions, when airline overscheduling is a major contributor to delays, regional carrier flight consolidation reduces delay levels. Massport proposes to monitor airline overscheduling conditions and to seek voluntary schedule adjustments from airlines to reduce delays caused by overscheduling. If airlines do not voluntarily comply, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
61.16	Analysis Assumptions	Passenger Forecasts	Alternatives 2, 3 and 4 (all of which exclude the new runway and two of which exclude all of the physical "improvements") should not be compared to the Preferred Alternative at the same fleet and passenger levels. This is because, the very "efficiency" of the Preferred Alternative, and the delays associated with the "inefficiencies" of alternatives 2, 3 and 4 would change the demand levels (and thus the fleet and passenger levels) at any point in time.	<p>The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce delays that occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in future passenger and aircraft activity at Logan Airport. The environmental impacts associated with these alternative forecasts have been evaluated in the Logan Airport Airside analysis and GEIRs.</p>

Code	Topic 1	Topic 2	Comment	Response
61.17	Noise	Model	<p>The DEIS/R presents a confusing and often inconsistent picture of the Project's noise impacts. This approach fails to meet MEPA/ EPA standards, as well as certain specific requirements of the comments and decision on the ENF.</p> <p>The noise data and the conclusions derived therefrom in the DEIS/R are flawed. Massport continues to employ its computer noise models even when it knows that the models understate actual noise, especially in Winthrop. For example, the DEIS/R utilizes noise data for 1993 from the models when actual, real life data from noise monitors is available which shows higher noise levels.</p>	<p>The standard FAA INM is known to produce results that are lower than the Day-Night Sound Levels measured at some of the Massport microphones. To minimize this error, the measured data for 1993 at the close-in monitors were compared to calculated values for the actual 1993 operations using 1993 runway use, day-night split. 1993 is representative of historic high fleet operating conditions at Logan Airport. The results showed that the monitors at the edge of the airport, which were primarily affected by noise radiated during aircraft ground roll, were low by an average of 6.5 dB. Those monitors, primarily affected by landing noise, were low by an average of 4 dB. However, those affected by takeoff noise radiated after the aircraft was airborne (noise levels in Point Shirley, for example) were ± 1 dB. Accordingly, in preparation for this study, Massport requested that the FAA approve an adjustment to the INM 5.0 database to add six dB to the noise radiated during ground roll and 4 dB to the noise radiated during the final phase of approach. These corrections were approved and were implemented throughout the Logan Airport Airside Project planning studies.</p>
61.18	Analysis Assumptions	Base Year	<p>Why does the DEIS/R utilize 1993 as the noise baseline year? That year featured the highest number of operations until last year, the highest delay ranking in Logan's history, a lower percentage of Stage 3 aircraft in the fleet than you would find in subsequent years, and in 1993 the INM model had not yet been corrected to cure the understatement of noise. In short, alleged "improvements" from the Project.</p>	<p>The Airside Project has independent utility from existing and proposed landside projects at Logan Airport.</p>
61.19	Noise	Impacts	<p>A basic premise of the DEIS/R is that without the airside "improvements" Logan will become a "north-south" airport. Winthrop is to east of Logan. Presumably, Winthrop would be a candidate for more noise with the "improvements." Yet the DEIS/R purports to demonstrate that Winthrop gets less noise with the Project. That does not make sense.</p>	<p>The principal noise impacts to Winthrop occur in the Point Shirley neighborhoods from departures on Runway 9 and arrivals on Runway 27, in the Court Road neighborhood by departures on Runway 22L/7R, and in the Amelia and Morton location by Runway 4R departures and Runway 22L arrivals and departures.</p> <p>Examination of the effective jet departures for the various alternatives and fleets in Table 6.2.2 of the Supplemental DEIS/FEIR shows that the effective jet departures on Runway 9 are significantly reduced by the Preferred Alternative. This is consistent with the North-South flow since the principal runways used in the northerly flow are Runway 4 for arrivals and Runway 9 plus Runway 4 for departures, with the main load on Runway 9. In Table 6.2.2 of the Supplemental DEIS/FEIR, the effective jet arrivals on Runway 27 are increased by four percent in the 29M Low Fleet scenario and decreased by 3.7 percent in the 37.5M Low Fleet scenario. These data are consistent with the analysis of the Day-Night Sound Levels values at Point Shirley.</p> <p>Examination of Runway 22 effective jet departures in Table 6.2.2 of the Supplemental DEIS/FEIR shows an increase of 0.7 percent for the Preferred Alternative in the 29M Low Fleet scenario and a decrease of 9.2 percent in the 37.5M Low Fleet scenario. Departures on Runway 4 show increases of 0.1 percent and 0.2 percent in those two years. Effective jet arrivals on Runway 22L show decreases of 0.1 percent and 1.9 percent, respectively.</p>

Code	Topic 1	Topic 2	Comment	Response
61.20	Alternatives	Taxiway Improvements	Ground taxi noise is a particular problem for Winthrop residents, especially at Court Road. Indeed, the DEIS/R shows that the highest level of ground taxi noise is found at Court Road, from aircraft taxiing to the 22 runway for departure. How then, can Massport and FAA claim that a centerfield taxiway which brings more planes per hour to the 22s for departure somehow reduces noise on Court Road?	The taxiway improvements are designed to improve ground movement efficiency and safety, and to reduce taxiing delays, thereby reducing associated noise and emissions. Section 3.3 of the Supplemental DEIS/FEIR describes several operating situations that would benefit from these improvements. Unidirectional Runway 14/32 would allow more evenly distributed runway use, reducing the use of the Runways 4/22 from 60 to 70 percent to 35 to 40 percent. When using Runways 22L/R for departures, the Centerfield Taxiway would be used for Runway 22L departures to bypass the queue for Runway 22R.
61.21	Noise	Model	The Secretary's decision on the ENF specifically requested that the DEIS/R should include the 60 dB contour. While the DEIS/R does not include the 60 dB contours throughout the main text, hidden away in Appendix L, Table 1.1 is data demonstrating that the population exposed to 60 dB with the airside "improvements" goes up in every fleet scenario.	Refer to Tables 5.2-3 and 6.2-3 through 6.2-5 of the Supplemental DEIS/FEIR for population data down to DNL values of 60 dB. Also, refer to newly included and newly excluded populations attributable to the Preferred Alternative in Tables 6.2-5 through 6.2-7 of the Supplemental DEIS/FEIR.
61.22	Alternatives	Runway 14/32	... [I]t is clear that the airside "improvements" do not deliver the promised noise benefits for portions of Winthrop. The important "night time equivalent" sound level values go up in Winthrop in the 29 million low fleet scenario at 4 out of 5 monitoring locations when you add Runway 14/32. In the 37.5 million low fleet scenario adding 14/32 makes these values go up at 2 out of the 5 locations in Winthrop.	<p>Refer to Tables 5.2-3 and 6.2-3 through 6.2-5 of the Supplemental DEIS/FEIR for population data down to DNL values of 60 dB. Also, refer to newly included and newly excluded populations attributable to the Preferred Alternative in Tables 6.2-5 through 6.2-7 of the Supplemental DEIS/FEIR.</p> <p>The nighttime equivalent sound levels (LeqN) at the two microphones at Point Shirley are estimated to change by +0.4 dB and -0.7 dB at Monitor Nos. 4 and 5 for the 29M Low Fleet scenario, and by -0.4 dB and -0.9 dB at the same monitors for the 37.5M Low Fleet scenario. More importantly, the Day-Night Sound Levels (DNLs) at these locations change by -0.9 dB and -1.7 dB for the 29M Low Fleet scenario and by -1.3 dB and -2.2 dB for the 37.5M Low Fleet scenario. This area also has a significant reduction in both persistence and dwell for these two fleets (refer to "Arr 27/Dep 9" on Figures 6.2-5 through 6.2-8 of the Supplemental DEIS/FEIR). These changes are improvements in the noise environment.</p> <p>The nighttime noise (LeqN) at Monitor No. 6 at Somerset and Johnson are estimated to change by +0.1 dB for the 1999 29M Low Fleet scenario, and -0.4 dB for the 37.5M Low Fleet scenario. The DNLs at this location change by +0.2 dB for the 29M Low Fleet scenario and by 0 dB for the 37.5M Low Fleet scenario. These changes represent no perceptible change in the noise environment.</p> <p>The LeqN at the two microphones near Runway 4R/22L are estimated to change by +3.2 dB and +0.9 dB at Monitor Nos. 7 and 8 for the 29M Low Fleet scenario, and by +0.9 dB and by -0.9 dB at the same monitors for the 37.5M Low Fleet scenarios. The DNLs at these locations change by +1.5 dB and -0.1 dB for the 29M Low Fleet scenario and by -0.3 dB and -1.1 dB for the 37.5M Low Fleet scenarios. These changes show an increase at Monitor No. 7 at Court Road and no net change at Monitor No. 8 at the Amelia and Morton location in 1999, but generally show decreases for the 37.5M Low Fleet scenarios for a net improvement in the noise environment in 2010. This area also has a significant reduction in both persistence and dwell for these two fleet scenarios (refer to "Arr 22/Dep 4" in Figures 6.2-5 through 6.2-8 of the Supplemental DEIS/FEIR).</p>

Code	Topic 1	Topic 2	Comment	Response
61.23	Air Quality	Model	Massport and FAA do not seem to have taken EPA's comments on the air pollution issue seriously. EPA called for an inventory of total air toxics. Where is it? EPA requested a combination of all landside and airside emissions. It is difficult to determine if that analysis is included in the DEIS/R.	The emission inventory in the Supplemental DEIS/FEIR includes both landside and airside emissions associated with Logan Airport.
61.24	Air Quality	State Implementation Plan	The issue of the Project's conformity with the federal Clean Air Act is an important one. Massport and FAA come to the conclusion that no Conformity Determination is required under the Clean Air Act, even though emissions go up for just about every category of pollutant if the Project is built. Their "reasoning," once again, is that the Preferred Alternative results in an alleged "reduction" of air pollutants when compared to the no action alternatives at the same fleet and passenger levels. Such reasoning, as demonstrated above completely ignores the induced demand issue and the cumulative effects issue that EPA noted.	Current guidance in 40 CFR 93, <i>Determining Conformity of Federal Actions to State or Federal Implementation Plans</i> , specifies procedures to determine the conformity of projects, like the Airside Project, to the Massachusetts State Implementation Plan (SIP). Based on this guidance, the project-related emissions are <i>de minimis</i> , and the Airside Project therefore conforms to the SIP.
61.25	Air Quality	State Implementation Plan	The Massport and FAA "theory" that, the Project does not require a Conformity Determination is simply asserted in the DEIS/R without any citation or reference to provisions of the Clean Air Act, its implementing regulations or case law that allow such a conclusion. The fact is that the Project will cause emissions to go up. One such emission is NOx. NOx is one of the precursors of ozone. Massachusetts is a "serious non-attainment" state for ozone under the Clean Air Act, as noted by Administrator DeVillars in his comments on the ENF. The Project will allow or accommodate ever-increasing numbers of Stage 3 aircraft to fly into and out of Logan. Stage 3 aircraft, while quieter, produce more NOx than the noisier planes that they are replacing. Therefore, it is clear that the Project will have a decidedly negative effect on the Commonwealth's ability to meet Clean Air Act requirements. A Conformity Determination should certainly be required.	Emissions of ozone precursors, NOx and VOCs, decrease under the Build Alternatives, when compared to the No Action Alternative. Current guidance in 40 CFR 93, <i>Determining Conformity of Federal Actions to State or Federal Implementation Plans</i> , specifies procedures to determine the conformity of projects, like the Airside Project, to the Massachusetts State Implementation Plan (SIP). Based on this guidance, the project-related emissions are <i>de minimis</i> , and the Airside Project therefore conforms to the SIP.
61.26	Air Quality	State Implementation Plan	The DEIS/R goes on at great length to make the case that delays at Logan are extremely costly. However, it is silent on the economic impact of the failure of Massachusetts to achieve required results under the Clean Air Act. Failure to achieve the requirements of the Act can result in the loss of federal highway funds. Given the cost of the Central Artery, what would be the impact of such a loss on the Massachusetts economy?	The General Conformity provision of the CAA prohibits any federal agency, including the FAA, from approving, funding or permitting any project or action that does not conform to the State Implementation Plan (SIP) – the plan developed by DEP and approved by the EPA to achieve the goals and requirements of the CAA. In this case the planned improvements to Logan Airport have been shown to conform to the SIP because the emissions associated with the projects are well within the <i>de minimis</i> levels of the General Conformity rule. Based on this finding, the projects are not viewed as being an impediment to the Commonwealth's progress in meeting the requirements of the CAA.

Code	Topic 1	Topic 2	Comment	Response
61.27	Air Quality	Impacts	<p>The dispersion model results do not seem to conform to the inventory model results. For example, at the 37.5 million low fleet scenario, 3 out of the 8 pollutants in 2010 for the true no-build alternative are either less than or the same as the results for the Preferred Alternative. The same holds true for the 37.5 million high fleet scenario in 2010. For the 45 million high fleet scenario, a full half (4/8) of the pollutants measured are less for the true no-build alternative than they are for the Preferred Alternative. These results draw into question the argument in the DEIS/R that the "efficiency" of the Preferred Alternative provides clear air pollution benefits over no-build alternatives.</p>	<p>For ease in assimilating the data, the dispersion modeling results are presented in both the tables and the figures of the EIS/R as the "highest predicted level" at each of the 12 receptors, irrespective of the wind conditions. In other words, it is highly unlikely (if not impossible) for all of these highest predicted concentrations to occur simultaneously. Rather, when wind conditions cause the highest concentrations at receptors on one side of the airport, receptors on the other side of the airport would experience concentrations less than their maximum predicted levels. This reporting technique was conceived to present the data in a concise way and show the potential worst-case conditions. Another factor that leads to these results is the change in aircraft operations with the planned airfield improvements (e.g. changes in aircraft taxi-in, taxi-out, landing and take-off patterns). While this may lead to small increases in concentrations at some receptors, lower concentrations are predicted to occur at others. In all cases, these changes are very small and will be imperceptible. Most importantly, the predicted concentrations are all well within the NAAQS - standards established by the EPA to protect public health. The emission inventory results show an overall reduction in emissions with the Preferred Alternative when compared to the No-build condition. This finding is more reflective of the improved efficiency realized by the planned improvements.</p>
61.28	Air Quality	Model	<p>The discussion in the DEIS/R of the dispersion modeling results is completely disingenuous and casts further doubt about the air pollution conclusions in the DEIS/R. When the results show that the Preferred Alternative has a slight advantage over the no-action alternative, the DEIS/R proclaims that the "the lowest levels occur in association with" the Preferred Alternative. However, when, as noted above, the results show that the no-action alternative has virtually the same advantage over the Preferred Alternative, the DEIS/R comes to the very different conclusion that "there will be no detectable differences in air quality impacts among the four alternatives," or "there is no significant difference." This lack of consistency in analysis draws into question the conclusions of the DEIS/R.</p>	<p>Generally, the Preferred Alternative has lower emissions and dispersion modeling indicates that pollutant concentrations will be within the NAAQS under all alternatives. Only small differences are seen among the four alternatives, when comparing dispersion modeling results.</p>
61.29	Environmental Review Process	FAA/NEPA, MEPA	<p>Both MEPA and NEPA require the DEIR/S to discuss impacts on land use. The CEQ regulations implementing NEPA are quite specific on this requirement. They provide that a environmental impact statement "shall include discussions of:</p> <p>(c) possible conflicts between the proposed action and the objectives of... local ... land use plans, policies and controls for the area concerned ... (g) Urban quality, historic and cultural resources, and the design of the built environment... There can be no doubt that Winthrop is part of the "area concerned." There can also be no doubt that Winthrop's "built environment," "urban quality," and "historic and cultural resources are heavily impacted by the airport and will be affected by the Project. ... The overflights from Logan have had a considerable impact on land use and land values in certain parts of Winthrop. Airport-related noise and air pollution impacts have helped to shape the "built environment" and "urban quality" of such neighborhoods.... Yet, the DEIS/R includes the rather astonishing statement that the airside improvements will "not alter existing land use patterns." ... Airport development and expansion have already had a major effect on land use in Winthrop. Further expansion associated with the Project will definitely impact land use patterns in Winthrop.... At a minimum the DEIS/R should look into the land use impacts on Winthrop brought about historically by Logan development and passenger growth. That historical experience should be utilized to develop a picture of what impacted portions of Winthrop will be like in 2010 at various passenger and fleet scenarios.</p>	<p>Refer to Section 6.3 of the Supplemental DEIS/FEIR for a discussion of land use impacts on the surrounding communities.</p>

Code	Topic 1	Topic 2	Comment	Response
61.30	Ecosystems	Wetlands	The DEIS/R claims that the project is not within any wetlands resource area. However, it also states that the Project will need an Order of Conditions from the Boston Conservation Commission. Obviously, then, there is at least a presumption of impact on a resource area. Such impacts need to be discussed.	Portions of the runway construction will involve work in the upland Buffer Zone adjacent to Boston Harbor, though no work in the harbor or adjacent wetlands is proposed. Work in the Buffer Zone will be limited to removal of unsuitable soil materials, minor regrading, placement of new clean fill and construction of the runway. This work requires an Order of Conditions from the Boston Conservation Commission. Details of runway construction impacts are described in Section 6.9 of the Supplemental DEIS/FEIR.
61.31	Ecosystems	Wetlands	There is no mention in the DEIS/R of the possibility that the Project would require an Order of Conditions from the Winthrop Conservation Commission. Clearly the Project will have an impact on wetlands areas in Winthrop. Noise and exhaust pollution will impact on Belle Marsh. Runoff and outflow increases from new taxiways may wash up on Winthrop shores. These issues should be discussed in the DEIS/R.	The Preferred Alternative will not require an Order of Conditions from the Winthrop Conservation Commission.
61.32	Ecosystems	Rare Species	The DEIS/R discusses the issue of the Upland Sandpiper nesting areas, but not in the context of the wildlife habitat portion of the Wetlands Protection Act.	The Upland Sandpiper is an upland species whose habitat at the airport is comprised primarily of infield areas of the airfield not subject to the Wetlands Protection Act as habitat.
61.33	Ecosystems	Wetlands	The Project is planned to be constructed on filled tidelands or waterways. It represents a significant expansion of structure on existing fill. The DEIS/R does not discuss any possible need for a Chapter 91 license and/or compliance with the Rivers and Harbors Act or the Clean Water Act.	In accordance with Section 310 CMR 9.03(3) of the Chapter 91 Waterways regulations, airport activities conducted by Massport at Logan Airport on previously filled tidelands are exempt from Chapter 91 permitting requirements. No work is proposed in the harbor or areas subject to the River and Harbors Act. A multi-sector NPDES Discharge Permit will be required for Clean Water Act compliance during construction. Massport has an individual NPDES permit for operations of the airport.
61.34	Noise	Sound Insulation	While historic resources in Chelsea are discussed, as noted above, impacted historic and cultural resources in Winthrop are ignored. ...[T]he DEIS/R summarily dismisses the acknowledged impacts on historic buildings in Chelsea with the proposed soundproofing of the historic residences affected. Soundproofing is a "band aid" approach... It hardly represents all feasible mitigation measures.	The Supplemental DEIS/FEIR includes a discussion of historic and cultural resources in Winthrop. Five properties in Winthrop that are included in the Inventory of Historic and Archaeological Assets of the Commonwealth fall within the 65 dB DNL contour (45 Enfield Road, 240 Pleasant Street, 75/77 Somerset Avenue, 88 Somerset Avenue, 94 Somerset Avenue). The implementation of a sound insulation program for affected historic residences is an accepted FAA mitigation, as outlined in FAR Part 150. FAA proposes to mitigate noise impacts by sound insulation all affected residences, historic and non-historic, that fall within the 65 dB DNL contour for the Preferred Alternative.
61.35	Noise	Impacts, Open Space/ Parkland	The Project will clearly have a major impact on the Harbor Islands parkland. It will create major noise problems for those making use of the islands and change the entire experience of anyone exploring the Harbor Islands. Such impacts need to be discussed and analyzed.	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
61.36	Open Space/ Parkland	Article 97	The possible applicability of Article 97 of the Massachusetts Constitution should be explored in the DEIS/R.	The Supplemental DEIS/FEIR contains additional analysis of the project relative to parklands. As depicted in Figure 6.3-4 of the Supplemental DEIS/FEIR, the Arnold Arboretum, Emerald Necklace, and Franklin Park are well outside the 65 dB DNL noise contour associated with the Preferred Alternative. Therefore, the Airside Project will have no impact on these parklands. In addition, the Boston Harbor Islands, while within the No Action Alternative 65 dB DNL noise contour, will have no noise increase under the Preferred Alternative. Refer to Section 6.3 of the Supplemental DEIS/FEIR for additional discussion of parklands. No Article 97 impacts result from any of the alternatives.

Code	Topic 1	Topic 2	Comment	Response
61.37	Noise	PRAS	The DEIS/R should take into account the fact that the PRAS goals are almost 20 years old. The DEIS/R should discuss whether or not the PRAS goals need revision in order to actually maximize environmental benefits.	The PRAS goals were established by the PRAS Advisory Committee during the development of the original computerized system between 1980 and 1983. The advisory committee was composed of representatives from Massport, the FAA, airlines, and 12 neighboring communities. It concluded that the PRAS goals should provide an equitable distribution of aircraft noise over the long-term, as well as short-term relief from excessive operations over certain neighborhoods. The FEIR demonstrates that there have been no significant demographic changes to warrant an update of the PRAS goals. A complete discussion of PRAS, the goals, and historic performance is included in Section 4.3 of the Supplemental DEIS/FEIR.
61.38	Noise	PRAS	It is also unclear from the DEIS/R just how much compliance with PRAS goals the Project might actually produce... For some runways the no-action alternative actually results in better PRAS compliance when compared to the Preferred Alternative. These discrepancies should be laid out and discussed fully in the DEIS/R.	There are no cases where the No Action Alternative provides better achievement of PRAS goals than the Preferred Alternative. Achievement must be compared on an overall basis such as the sum of the absolute or squared deviations from the goals. While the use of one runway may be closer to the goal when comparing the No Action Alternative with the Preferred Alternative, the goal deviation from all runways must be considered. Section 4.3 of the Supplemental DEIS/FEIR contains a complete description of the PRAS system and achievement of historic goals and explains this issue further. Appendix H of the Supplemental DEIS/FEIR presents achievement statistics for each fleet and alternative. Each improvements package provides increased goal achievement when compared with the No Action Alternative, and Alternatives 1 and 1A, which include the Runway 14/32, provide the greatest increase in annual PRAS goal performance.

Code	Topic 1	Topic 2	Comment	Response
61.39	Public Health	Effects	<p>Public health issues relating to airport activity remain a major concern in Winthrop and in other "close-in" communities...The DEIS/R fails to advance the inquiry into airport-related public health issues. The Project will clearly enhance capacity at Logan and thus increase noise and emissions. ...The DEIS/R should note... [the Natural Resources Defense Council and EPA] studies, update them and present a comprehensive review of what is known about the health effects of airport noise and emissions. Massport and the FAA should work closely with Massachusetts and federal health agencies to address the legitimate health concerns of Winthrop residents who are exposed to potentially harmful emissions. Since the Project will increase those emissions, the DEIS/R must deal with this subject.</p>	<p>The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport.</p> <p>The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.</p> <p>Implementation of the recommended Airside Project, specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport.</p> <p>The runway would substantially reduce the delays that now occur during northwest wind conditions. Preventing these delays would represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable, and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred without the runway. Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in current and future passenger and aircraft activity at Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
61.40	Regional Transportation	Regional Airports	The DEIS/R ignores several reasonable alternatives. Rather than discussing and comparing such alternatives, the entire alternatives discussion in the DEIS/R centers on various combinations of airside "improvements" and the no-build alternative. It neglects true alternatives to the Project. Two such alternatives involve other airports. There is no discussion in the DEIS/R about a second major airport. Given the ground access and other constraints confronting Logan, a second airport is clearly an option that is worth consideration.	Comment noted.
61.41	Regional Transportation	Regional Airports	Another airport alternative ignored by the DEIS/R is Hanscom Field. This facility is owned by Massport, has adequate runways, is convenient to Boston and is underutilized. The DEIS/R does not explore the possibility of opening up Hanscom to commercial passenger and/or freight traffic. It does not discuss the fact that Federal Express once operated out of Hanscom or that the Hanscom Master Plan, agreed to by the surrounding towns, allows for an increase in operations over the current level. It also fails to acknowledge that many of the so-called "operations" at Hanscom are "touch and go" training exercises where each "touch" and each "go" is considered a separate operation, thus greatly inflating the operational level at Hanscom.	Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.
61.42	Alternatives	Taxiway Improvements	Another alternative is that of stopping the proposed centerfield taxiway at Runway 15/33. This alternative would greatly reduce taxiway noise and pollution for Winthrop residents. It is not even mentioned in the DEIS/R.	Most of the delay reduction and environmental benefits are a result of the availability of the north end of the Centerfield Taxiway.

Code	Topic 1	Topic 2	Comment	Response
61.43	Regional Transportation	Passenger Rail	The DEIS/R should explore real participation by Massport in promoting projects like high speed rail and the NSRL (North-South Rail Link), including the expenditure of funds.	Massport has actively encouraged regional transportation alternatives to Logan Airport, including rail. Massport supports intercity rail planning through its membership in the Boston Metropolitan Planning Organization (MPO). The MPO is a cooperative planning board whose membership also includes MassHighway, Metropolitan Area Planning Council; MBTA, and MBTA Advisory Board. As members of the MPO, Massport and these agencies are responsible for preparing the <i>Boston Transportation Improvement Program (TIP)</i> and the <i>Transportation Plan for the Boston Region</i> . In this capacity, Massport influences regional transportation plans for intercity rail. Massport also holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic.
61.44	Noise	Model	California and many European countries utilize the Community Noise Equivalent Level ("CNEL") instead of the DNL. The DSEIS/R should present CNEL data.	There is no regulatory or scope requirement to provide CNEL contours in Massachusetts. Furthermore, CNEL values for an airport usually differ from DNL values by only a few tenths of a decibel. The metric would not lead to any different conclusions than those drawn here using DNL.
61.45	Noise	Nighttime Noise	Massport and FAA refuse to even consider applying for curfews under the Airport Noise and Capacity Act of 1990. While such an application may be fraught with difficulty, it is still legally available and thus still a reasonable alternative.	The FAA has stated that it does not intend to grant curfew regulations of Stage 3 aircraft. Therefore, such a regulation has not been proposed as a mitigation action in this study.

Code	Topic 1	Topic 2	Comment	Response
61.46	Environmental Review Process	MEPA	The MEPA regulations require the DEIS/R to contain Section 61 findings. The document 56-46 does not meet this requirement. Mitigation commitments are sorely lacking.	<p>Refer to the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.</p> <p>Chapter 8 of the Supplemental DEIS/FEIR summarizes Massport's proposed project-specific mitigation program associated with the Preferred Alternative including:</p> <p>Runway 14/32 would be designed, constructed, and operated to handle over-water operations only (unidirectional). Massport would seek to construct Runway 14/32 to reflect unidirectional use.</p> <p>To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the <i>Logan Airport 1999 ESPR R</i>. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.</p> <p>Relocation assistance will be provided to eligible tenants of Cargo Building 60.</p> <p>The potential loss of Upland Sandpiper habitat will be mitigated by altering airfield mowing procedures, implementing an on-airfield reconnaissance program and restoring off-site habitat.</p> <p>During the construction period an extensive array of traffic, air quality and noise mitigation measures will be employed to mitigate temporary construction impacts.</p> <p>Since the publication of the Airside Project Draft EIS/EIR, Massport is proposing the following additional mitigation measure:</p> <p>A PRAS monitoring system to gather data and report on the actual achievement of PRAS. The objective of this system is to improve the achievement of the PRAS goals and to provide a broader platform for disseminating of the monitoring results.</p> <p>While not related to the Airside Project, Massport is proposing the following initiative:</p> <p>Should the passenger activity level require it, Massport will identify a conceptual small community exemption program for PPP that will reduce the expected degree of service disruption without undermining the PPP Program's delay reduction benefits, and that could be incorporated as part of any PPP regulations come into effect in the future.</p> <p>Massport is actively involved in many air quality initiatives and explored other options to reduce emissions from activities at Logan Airport in the <i>Logan Airport 1999 ESPR</i> (previously GEIR).</p>
61.47	Noise	Sound Insulation	...soundproofing is not adequate mitigation. It is a "band aid" approach which is completely ineffective for much of the year and totally ineffective outside of a soundproofed building. Yet, the DEIS/R notes repeatedly that soundproofing is the mitigation answer to all noise problems.	<p>Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i>. Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including:</p> <p>Noise abatement and runway use restrictions;</p> <p>Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation;</p> <p>Encouraging growth at Worcester Regional Airport and other alternative airports; and</p> <p>Monitoring and improving achievement of PRAS goals.</p>

Code	Topic 1	Topic 2	Comment	Response
61.48	Ecosystems	Endangered Species	Massport has had years to deal with the Upland Sandpiper habitat problem. Instead of coming up with a plan for mitigation that can be reviewed in the DEIS/R, the document just notes that Massport is working with another state agency to develop options. That is not good enough.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.
61.49	Alternatives	Runway 14/32	The DEIS/R assumes that Runway 14/32 will be "unidirectional" only. However, it does not provide any detailed discussion as to how that restriction will be put in place and maintained over time. Indeed, the DEIS/R simply recites that FAA "policy" will keep 14/32 unidirectional.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p>

LETTER 62

TOWN OF WINTHROP
NOISE, AIR POLLUTION AND AIRPORT HAZARDS COMMITTEE -

MEMBERS:

Jerome E. Fallo, Chairman
Robert L. Driscoll, Sr., Vice-Chairman
Richard N. Bangs
Richard D. Dimes
Robert E. Pulsifer
Matthew Lanza, Selectperson
Gerald B. Ogas, Selectperson
Robert L. Driscoll, Jr., Selectperson
Representative Robert A. DeLeo

Nancy A. Loubier, Secretary

Town Hall
Winthrop, MA 02152
(617) 846-1742

Mail Correspondence to:
80 Jefferson Street
Winthrop, MA 02152

Chairman: (617) 846-3433
Vice-Chairman: (617) 846-6952

**PRESENTED TO THE MASSACHUSETTS ENVIRONMENTAL
PROTECTION AGENCY (MEPA) ON APRIL 7, 1999 AND APRIL 8, 1999**

This has become the year that Massport is finally being held to account by the communities. The objections to Massports inadequate proposal are growing and spreading almost uncontrollably. Congressman, Michael Capuano, Mayor Thomas Menino, Representative Robert Deleo, Senator Robert Travaglini and many of their fellow representatives and senators, Chelsea City Council, Board of Selectmen, Town of Winthrop, just to name a few are forcefully against the construction of runway 14/32, and other projects. These projects may temporarily provide a small decrease in the delays in air traffic at Logan Airport, but they will increase the number of flights per hour per day, and the environmental degradation that goes with those flights. If you had attended meetings on airport issues in Winthrop, Chelsea, Revere, Jamaica Plain, Hyde Park, South Boston, Roxbury, Melrose, East Boston and Charlestown, you would have been impressed by the expressed outrage and indignation at these Massport Proposals.

62.1

You may ask yourself why is Massport causing an uproar and strenuous objections by many of the leaders and communities who were silent in 1997? It is somewhat surprising that the communities of Winthrop, East Boston and South Boston are opposing these plans, when Massport has projected thirty to forty (30% - 40%) percent decrease in noise in these areas. Many of you have been promised less air pollution from the contaminants generated by the operations of Loan International Airport.

The answer is simple. The citizens of all of these communities finally understand that Massport can not be believed; that any relief promised by Massport would simply be short term if at all. Eventually, these communities that have been promised relief will be subjected to even a higher level of noise by the year 2010, than these communities are experiencing today.

62.2

I am going to refer you to Massports draft Environmental Impact Statement/Report, Table 4.5-1, P 4-29: you will note that if Massport is allowed it's preferred alternative 1A (which encompasses the construction of runway 14/32 construction of center field taxi way and reducing the approaching minimums of runway

62.3

15R, 22L, 27 and 33L,) the flight delays will increase from 168,000 to 236,000 per year by 2010. In 1999, Massport projects flight delays of only 126,500. So things are not going to get better at Logan even with the new runway.

The increase of passengers at Logan in the year 2010 will increase by approximately 42%. I suggest gentlemen that you try to visualize the increase in the amount of cars and trucks on the Massachusetts Turnpike, Southeast Expressway and the tunnels, during rush hour. Massport plans indicate one major and obvious error.... It has failed to plan for growth!

If you review the history of Massport, and the web of political intrigue, that has been spun by Massport and certain political leaders, the issue of expansion has taken on the appearance of a social and economic spin-off. In 1990-1991, James King, now a presidential fellow at Trinity College, was then Chairman of the Mass Aeronautics Commission, who studied sites for a second major airport. He recommended that serious consideration be given to the Fort Devens Site. However, Governor Weld removed that consideration completely from the table. I am referring to a Globe article, March 17, 1999. Secretary of Transportation of the Commonwealth, Fred Salvucci has admitted that he and then Governor Dukakis promised the residences of East Boston that they would be no further expansion at Logan International Airport. (Also Globe, 3/17/99)

There has been no consideration or studies directed at expanding Hanscom Airfield in Bedford, which has two existing lengthy runways. A commitment from Massport to focus its energies and funding to improving the cargo and terminal facilities at Hanscom would help their cause far greater than the short term of runway 14/32 at Logan. Massport will admit, if confronted, that the expansion at Hanscom would be a political nightmare. A recent article in the Globe regarding a meeting that Governor Celluci granted to a selectman from the Town of Lexington, as you know, Lexington is adjacent to Hanscom. The governor was quoted as stating to the selectman that he certainly would not support an airport or expansion in an area where the residents "did not want it" Governor Celluci has not responded to the January 25, 1999 request by the residents of the Town of Winthrop for a meeting on the airport issues, and he probably will not respond. We do not want it. Governor Cellucci, are we a lesser class of citizens than those from Lexington well-heeled suburbs? FAA, are you complying with your environmental justice requirements?

Massport has failed to take into consideration the updating and modernizing of either Worcester Municipal Airport, or New Bedford. For years, we have urged Massport to work on the Worcester Airport development, but we were told that Massport has no authority, Yet Peter Blute, the CEO at Massport was quoted in the Herald issue of

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March 16, 1999 that "Massport is in the process of taking over the operation of Worcester Airport." What does this mean? Why was it not done years ago?

Rather than Massport facing reality, in developing these regional airports and also laying the foundation for a second major airport after the year 2010, it commits itself to spending \$200,000 in an ad campaign in order to "sell" runway 14/32. A substantial portion of those funds are ours, the taxpayer monies!

Massport has done very little, in actively promoting construction of the North/South Station link (except to attend meetings). In November of 1999, Amtrak will begin a regular schedule of high speed trains traveling at 150 miles per hour reaching Penn Station, in New York in approximately 3 hours. A North/South Station link would open up high speed rail travel to all commuter lines running into North Station, the Woburn Regional Transportation Center and Northern New England and would divert a substantial number of air travelers to rail travelers.

62.8

Finally, I would like to address the issue of the economic effect of concentrating on regional airports. In the Boston Business Journal of March 19, 1999, Paul Guzzi, the CEO of the Boston Chamber of Commerce stated that the New Runway is "good for the economy and it is good for jobs". Is he implying that utilization of regional airports will cause a decline in the greater Boston economy? I believe that to be an improper statement. First of all, the airlines, internally are one of the major causes of delays. If instead of utilizing smaller aircraft on a more frequent basis they used larger planes on an infrequent basis, there would be substantial decrease in the noise. More importantly, people will still come to Boston with or without the construction of runway 14/32. Massport has admitted that in its statement. Hanscom's airfield is approximately 15 mil from Boston. With proper link into the Massachusetts Turnpike, Worcester would be within a reasonable distance from Boston. These regional airports would maintain and improve the Boston economy, as well as, provide the same number of jobs if not more as would the current Massport expansion plan.

62.9

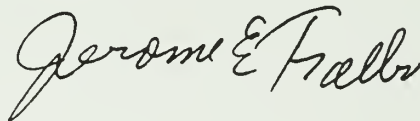
In closing, I would like to quote sections from former Governor William Weld's executive order number 385, in the fifth paragraph he states "whereas in the absence of the effective growth management, the burden of balancing economic development with resource protection is not spread equitably, but falls disproportionately on proponents on the most recent development, as well as, on communities lacking sufficient means to protect their resources and guide the development." (emphasis added). He then went on to issue several orders under "declaration of policy". In section 3, he ordered all State Agencies, Departments, Boards, Commissions, Authorities and instrumentality's of the Commonwealth (hereafter "agencies") shall evaluate the effect of their current regulations,

62.10

policies, plans, and practices on their and others' ability to facilitate sustainable economic development and to **preserve environmental quality and resources**, and shall adopt changes to the extent necessary to effectively contribute to the attainment of these objectives; provided that no such change shall infringe on the jurisdiction or authority of municipal, county, regional or Federal Government.

Massport has failed to preserve environmental quality, and resources. I urge you to find the Massport Environmental Impact Statement/Report **Inadequate**.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Jerome E. Falbo". The signature is written in dark ink and is positioned above the printed name.

JEROME E. FALBO, CHAIRMAN

Letter 62

Town of Winthrop, Noise, Air Pollution and Airport Hazards Committee

Jerome E. Falbo

Code	Topic 1	Topic 2	Comment	Response
62.1	Alternatives	Runway 14/32	...[T]he construction of Runway 14/32, and other projects. ...may temporarily provide a small decrease in the delays in air traffic at Logan Airport but they will increase the number of flights per hour per day, and the environmental degradation that goes with those flights.	<p>Massport has developed a range of potential future traffic levels for planning purposes. For a variety of reasons, Massport believes that the forecasts described as 1999 and 2010 projections in the <i>Logan Airside Improvements Feasibility Study, Phase I Report and the DEIS/EIR</i> will not be achieved until after 1999 and 2010, respectively. The Airport is likely to reach 29 million passengers (formerly the "1999" forecast) in 2003. Developments at the regional airports and Amtrak's high speed Acela Express rail service to New York are expected to further slow Logan Airport's passenger traffic growth. As a result, Logan Airport is now expected to reach 37.5 million passengers in 2015 and 45 million passengers in 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period that extends beyond 2020. Refer to Chapters 1 and 4 of the Supplemental Draft EIS/Final EIR for a complete discussion of the planning forecasts.</p> <p>Projected changes in flight patterns and associated noise shifts are consistent with the PRAS goals, which were studied and approved by the community when established. Activity increases over certain communities are offset by activity reductions over other severely impacted communities and by activity increases over water.</p>
62.2	Alternatives	Runway 14/32	...[T]he communities that have been promised relief will be subjected to even a higher level of noise by the year 2010, than these communities are experiencing today.	<p>In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overfly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. In fact, the most heavily impacted communities will experience a decrease in overflights compared to 1998 levels. With the Preferred Alternative, when Logan Airport reaches 29 million passengers, overflights from Runway 4 arrivals and Runway 22 departures, which affect South Boston, Quincy, Milton, and Braintree, will decrease from 107,861 in 1998 to 58,305 operations. Similarly, overflights affecting Winthrop (Runway 27 arrivals and Runway 9 departures) will decline from 88,224 in 1998 to 55,805. As a result of the relief for these communities, flights over the water and flights over less impacted communities will increase.</p>

Code	Topic 1	Topic 2	Comment	Response
62.3	Alternatives	Preferred Alternative	[With] Alternative I A (which encompasses the construction of Runway 14/32[,] construction of center field taxi way and reducing the approaching minimums of runway 15R, 22L, 27 and 33L,) flight delays will increase from 168,000 to 236,000 per year by 2010. In 1999, Massport projects flight delays of only 126,500. So things are not going to get better at Logan even with the new runway.	Massport has developed a range of potential future traffic levels for planning purposes. For a variety of reasons, Massport believes that the forecasts described as 1999 and 2010 projections in the <i>Logan Airside Improvements Feasibility Study, Phase I Report and the DEIS/EIR</i> will not be achieved until after 1999 and 2010, respectively. The Airport is likely to reach 29 million passengers (formerly the "1999" forecast) in 2003. Developments at the regional airports and Amtrak's high speed Acela Express rail service to New York are expected to further slow Logan Airport's passenger traffic growth. As a result, Logan Airport is now expected to reach 37.5 million passengers in 2015 and 45 million passengers in 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period that extends beyond 2020. Refer to Chapters 1 and 4 of the Supplemental Draft EIS/Final EIR for a complete discussion of the planning forecasts.
62.4	Ground Transportation	Access to Logan	The increase of passengers at Logan in the year 2010 will increase by approximately 42%. ...Visualize the increase in the amount of cars and trucks on the Massachusetts Turnpike, Southeast Expressway and the tunnels, during rush hour. Massport ...has failed to plan for growth!	<p>Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPR</i> (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).</p> <p>Massport is constantly striving to make Logan Airport a more efficient transportation center with less impact on surrounding communities by improving mass transit access to Logan Airport. The Airside Project makes Logan Airport more efficient and will not affect vehicle traffic, transit systems or major roadway intersections. The Supplemental DEIS/FEIR discusses all the environmental impacts from the Airside Project. The ESPR/GEIR and its Annual Updates discuss Massport's efforts to lessen Logan Airport's total environmental footprint, especially impacts from ground access. Finally, with regard to caps on airport operations, federal constitutional provisions (preemption, commerce clause, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to control the number of aircraft operations at Logan Airport. However, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
62.5	Regional Transportation	Regional Airports	There has been no consideration or studies directed at expanding Hanscom Airfield in Bedford, which has two existing lengthy runways. A commitment from Massport to focus its energies and funding to improving the cargo and terminal facilities at Hanscom would help their cause far greater than the short term of Runway 14/32 at Logan.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.
62.6	Regional Transportation	Regional Airports	[Is the] FAA...complying with... [its] environmental justice requirements ...[by failing to seriously consider Hanscom]?	Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively. Refer to response to comment 62.5.

Code	Topic 1	Topic 2	Comment	Response
62.7	Regional Transportation	Regional Airports	Massport has failed to take into consideration the updating and modernizing of either Worcester Municipal Airport, or New Bedford.	<p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives. Massport disagrees that its record in diverting traffic to other airports is unsuccessful. Since 1996 eight out of ten new passengers in New England were directed to regional airports, which include T.F. Green/Providence, Worcester Regional, and Manchester airports. In 1999, Massport estimates that regional airports attracted 2.4 million passengers, that would have otherwise used Logan Airport. PRAS was established after community input in the 1980s. The goal of PRAS was to distribute noise equitably, based on demographic considerations.</p> <p>During very high demand periods, the controllers have little or no flexibility for runway selection. Unidirectional Runway 14/32 would give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals by redirecting many flights to overwater routes. The addition of Runway 14/32 is the single most important mechanism to achieve equitable geographic distribution of aircraft operations and noise.</p> <p>Runway 14/32 and all other airside improvements would reduce current and future delays and enhance safety. The sooner that these improvements are implemented, the more long-term delay benefits will be realized.</p>
62.8	Regional Transportation	Passenger Rail	Massport has done very little, in actively promoting construction of the North/South Station link (except to attend meetings)... A North/South Station link would open up high speed rail travel to all commuter lines running into North Station, the Woburn Regional Transportation Center and Northern New England and would divert a substantial number of air travelers to rail travelers.	The official estimate of passenger diversion from Logan Airport to the North/South Rail Link is 46,700 passengers in 2010, approximately 0.1 percent of Logan Airport's expected passenger traffic in 2010. Refer to Technical Report No. 4 Ridership Methodology and Forecasting Study of the North/South Rail Link Project (February 1998).

Code	Topic 1	Topic 2	Comment	Response
62.9	Regional Transportation	Regional Airports	Hanscom's airfield is approximately 15 mil[es] from Boston. With proper link into the Massachusetts Turnpike, Worcester would be within a reasonable distance from Boston. These regional airports would maintain and improve the Boston economy, as well as, provide the same number of jobs if not more as would the current Massport expansion plan.	Refer to response to comment 62.5. Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
62.10	Environmental Review Process	MEPA	[Massport has failed to comply with] Governor William Weld's executive order number 385....	Massport disagrees with this assertion, as extensively described in Chapter 1 of the Supplemental DEIS/FEIR.

TOWN OF WINTHROP
NOISE, AIR POLLUTION AND AIRPORT HAZARDS COMMITTEE

MEMBERS:

Jerome E. Falbo, Chairman
Robert L. Driscoll, Sr., Vice-Chairman
Richard N. Bangs
Richard D. Dimes
Robert E. Pulsifer
Matthew Lanza, Selectperson
Gerald B. Ogun, Selectperson
Robert L. Driscoll, Jr., Selectperson
Representative Robert A. DeLeo

Nancy A. Loubler, Secretary

LETTER 63

April 12, 1999

Town Hall
Winthrop, MA 02152
(617) 846-1742

Mail Correspondence to:
80 Jefferson Street
Winthrop, MA 02152

Chairman: (617) 846-3433
Vice-Chairman: (617) 846-6952

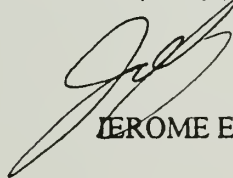
Massachusetts Environmental Protection Agency
100 Cambridge Street
Boston, MA 02202

Attention: Arthur Pugsley, MEPA

Dear Mr. Pugsley:

Enclosed is the Town of Winthrop Noise, Air Pollution, Airport Hazards
Committees written comments to Massachusetts Port Authorities Environmental Impact
Statement/Report.

Very truly yours,



JEROME E. FALBO

JEF:jp
Enclosure

Return-path: ArtFlavin@aol.com
From: ArtFlavin@aol.com
Full-name: Art Flavin
Message-ID: <86fa466c.24511503@aol.com>
Date: Thu, 22 Apr 1999 20:12:51 EDT
Subject: Fwd: Response to Draft EIS/R EOE #10458
To: Ardwest7@aol.com

TOWN OF WINTHROP
NOISE, AIR POLLUTION AND AIRPORT HAZARDS COMMITTEE
ENVIRONMENTAL HEALTH FACTS SUBCOMMITTEE

Robert Durand
Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston MA 02202

April 21, 1999

Logan Airside Improvements Planning Project EOE #10458

Dear Mr. Durand,

The following comments are being submitted in response to the above Draft Environmental Impact Statement/Report (EIS/R). It is the opinion of the members of this committee that the Draft EIS/R does not adequately address very critical issues regarding the generation of airborne pollutants from the combustion of petrochemical fuels, and the effects of these environmental pollutants on the health of Winthrop residents. A considerable proportion of the residents of Winthrop are concerned about what they perceive to be a high incidence of respiratory disease and cancer, which they attribute to exposure to pollutants currently and historically generated by airport activities. In the current Draft EIS/R, Massport estimates (Vol IV, Tables E14-1 Through E14-4) indicate that, in 1999, airport related activity releases 50,000 pounds of toxic pollutants into the air daily.

The relationship between these pollutants and serious respiratory disease is well established in the literature. Considerable evidence exists for elevated levels of Asthma, and Respiratory Tract Cancer in both East Boston and South Boston. Winthrop, primarily a residential community located seaward of the airport, in the past has shown lesser health effects than these communities. However more recent reports (Massachusetts Disease Registry) show that we have now reached the incidence levels of Asthma of our neighbor communities. Lung Cancer levels in Winthrop (Massachusetts Cancer Registry), not in themselves excessive, consistently demonstrate a markedly increased rate for females, who in past years have constituted the at home, exposed population. As these results become clearer, the wisdom of locating airports, generators of concentrated petrochemical combustion waste, in urban centers becomes very suspect.

While we are aware that the changes proposed in the Draft EIS/R indicate increased efficiency of operation of the airport, and project only slight change in the level of pollutants emitted, we strongly feel that the current levels are themselves creating a significant negative impact on the health and well being of Winthrop residents. We strongly oppose any development which will increase the operational capacity of Logan Airport until these adverse impacts and their relation to airport pollution generation have been thoroughly addressed.

63.1
(cont.)

We note that these issues concerning immediate and local impact were raised in public comments, and in the Secretary of Environmental Affairs Certification statement with regard to the Logan Airport GEIR annual update in 1996, EOE # 3247. Massport was directed at that time to initiate such studies, but we have no knowledge that such activities were ever undertaken. Massport has instead relied on its participation in the State Implementation Program, and the projection of pollutant concentrations by EPA dispersion modeling techniques which indicate levels within the National Ambient Air Quality Standards. We would like to make the following points:

63.2

1. Accurate analysis of the public health impact of this localized pollution source requires that the data be gathered and analyzed for differential effects on local neighborhoods within the affected area, and this data be compared to meteorological dispersion of pollutants generated by airport activity.

2. Dispersion models which predict essentially no variation in concentration of pollutants throughout the Town of Winthrop, which has neighborhoods both a few hundred yards, and several miles from the generation source must be considered very suspect. The technology exists for the direct measurement and monitoring of these pollutants, and should be established without delay.

63.3

We feel that addressing these issues must be carried out before any actions are taken to further the development or operational capacity of this airport.

J.B. Dumser, PhD, CIH, Chairman of the Subcommittee

Committee Members:

Barbara Bishop
Jack Dowd
Madeline Burke
Arthur Flavin, Sr.
Bob Massa
John Marcy
Greg Curci
Jean McNeish
Barbara Flavin
Harvey Maibor
Judy Silck
Conal Foley

Letter 63

Town of Winthrop, Noise Air Pollution & Airport Hazard Committee

Jerome E. Falbo

Code	Topic 1	Topic 2	Comment	Response
63.1	Public Health	Effects	...the Draft EIS/R does not adequately address very critical issues regarding the generation of airborne pollutants from the combustion of petrochemical fuels, and the effects of these environmental pollutants on the health of Winthrop residents. A considerable proportion of the residents of Winthrop are concerned about what they perceive to be a high incidence of respiratory disease and cancer, which they attribute to exposure to pollutants currently and historically generated by airport activities... While we are aware that the changes proposed in the Draft EIS/R indicate increased efficiency of operation of the airport and project only slight change in the level of pollutants emitted, we strongly feel that the current levels are themselves creating a significant negative impact on the health and well being of Winthrop residents. We strongly oppose any development which will increase the operational capacity of Logan Airport until these adverse impacts and their relation to airport pollution generation have been thoroughly addressed.	Public health issues are discussed in Section 6.8 of the Supplemental DEIS/FEIR.
63.2	Air Quality	Model	Accurate analysis of the public health impact of this localized pollution source requires that the data be gathered and analyzed for differential effects on local neighborhoods within the affected area, and this data be compared to meteorological dispersion of pollutants generated by airport activity.	Public health issues are discussed in Section 6.8 of the Supplemental DEIS/FEIR.
63.3	Air Quality	Model	Dispersion models which predict essentially no variation in concentration of pollutants throughout the Town of Winthrop, which has neighborhoods both a few hundred yards, and several miles from the generation source must be considered very suspect. The technology exists for the direct measurement and monitoring of these pollutants, and should be established without delay.	The air quality dispersion model used for the Supplemental DEIS/FEIR complies with EPA and FAA standards.



March 30, 1999

LETTER 64

Mr. Arthur Pugsley – EOE No. 10458
Secretary of Environmental Affairs
Attention MEPA Office
100 Cambridge Street
20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of more than 340,000 individual pilots and aircraft owners in the United States, more than 30,000 of whom reside in New England. AOPA and its members are very interested in any action that will enhance the access to and capacity of airports in New England and the efficiency of the air traffic control system.

For more than ten years, AOPA has been participating in the airside development issues at Boston-Logan International Airport. Recently we were provided the opportunity to review the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) entitled "Logan Airside Improvement Planning Project."

It is our assessment that reducing delays through new infrastructure, including runways, is the appropriate way to ensure that the Boston Metropolitan area will be able to meet the growing demand for air transportation in the 21st century without suffering significant environmental and economic consequences. Alternative 1A in the Draft EIS/EIR would enhance capacity by building runway 14/32 and a new centerline taxiway. This alternative also calls for improvements to additional taxiways and would address the approach minimums for runways at Logan.

Additionally, Alternative 1A provides solutions for the recognized needs of the users of Boston-Logan International Airport while minimizing and mitigating environmental impacts, including noise, on the surrounding communities. Alternative 1A not only protects but also enhances the socioeconomic benefits that Boston-Logan International Airport brings to the Boston Metropolitan area and New England as a whole. Alternative 1A would also reduce fuel-wasting delays and in many cases reduce noise, especially late at night, for the communities most severely impacted at the present time.

On behalf of our New England members, AOPA fully supports Alternative 1A and urges its timely implementation.

64.1

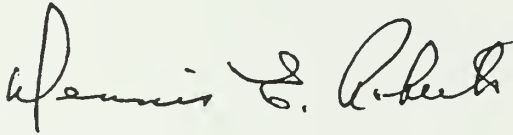
Mr. Arthur Pugsley

Page 2

March 30, 1999

Should you require any additional information on this or any other related issue, please feel free to contact me at (301) 695-2221.

Sincerely,

A handwritten signature in cursive script, reading "Dennis E. Roberts". The signature is written in dark ink and is positioned above the printed name and title.

Dennis Roberts
Vice President, Executive Director
Government and Technical Affairs

Letter 64
Aircraft Owners & Pilots Association
Dennis Roberts, Vice President,
Executive Director of
Government and Tech. Affairs

Code	Topic 1	Topic 2	Comment	Response
64.1	Alternatives	Preferred Alternative	It is our assessment that reducing delays through new infrastructure, including runways, is the appropriate way to ensure that the Boston Metropolitan area will be able to meet the growing demand for air transportation in the 21st century without suffering significant environmental and economic consequences...On behalf of our New England members, AOPA fully supports Alternative 1A and urges its timely implementation.	Comment noted.

McGOWAN, ENGEL, TUCKER & SCHULTZ

(A PROFESSIONAL ASSOCIATION INCLUDING A PROFESSIONAL CORPORATION)

COUNSELLORS AT LAW

125 HIGH STREET

HIGH STREET TOWER, SUITE 2601

BOSTON, MASSACHUSETTS 02110

PAUL A. McGOWAN, III

MARK D. ENGEL

THOMAS H. TUCKER

STEPHEN SCHULTZ

CATHY P. BROOKS

TELEPHONE (617) 951-9980

FACSIMILE (617) 951-0048

OF COUNSEL

PETER L. KOFF

MICHAEL ROITMAN

SUSAN GRANDIS BRANDER, P.C.

LETTER 65

April 16, 1999

Mr. John Silva
Manager, Environmental Programs
New England Region
Federal Aviation Administration,
12 New England Executive Park
Burlington, MA 01803

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Mr. Silva:

I am submitting the following comments on behalf of Airport Impact Relief, Inc. ("AIR, Inc.") in regard to the Draft Environmental Impact Statement/Report ("EIS/R") for the above project.

The Draft EIS/R does not adequately describe the environmental and socio-economic impacts of the project and evaluate other reasonable alternatives to the proposal chosen by Massport as its preferred alternative. Furthermore, to the extent this document has been circulated to comply with the requirements of Federal law, the Draft EIS/R shows that the Federal Aviation Administration has not properly carried out its own obligations under relevant provisions of Title 49 of the United States Code, the National Environmental Policy Act ("NEPA") and its implementing regulations, and the requirements of Executive Order 12898 and the DOT Order regarding environmental justice.

1. Federal statutory context. Massport's proposal to construct a new Runway 14/32 and other airfield improvements at Logan Airport will trigger a number of FAA and Secretary of Transportation approvals and/or actions with respect to a future grant application, changes to the Logan airport layout plan, airspace determinations, and related actions. Accordingly, this Draft EIS/R should reflect the strong Federal presence in the project, discuss the Federal policies and future Federal approvals which will be necessary, and provide a documented record of how the FAA has carried or will carry out its obligations under Federal law with regard to this project. The Draft EIS/R falls far short in providing this information to the public.

65.1

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Mr. John Silva
April 16, 1999
Page 2

For example, the brief reference in Table 8.8-1 on pages 8-27 and 8-28 of the need for FAA "Federal funding approval" and a "Section 4(F) Determination" from the U.S. Department of Transportation, and the actual Section 4(f) discussion on pages 8-18 to 8-21, totally fail to provide the reader with a fair understanding of the important requirements of Federal law with respect to the approval of airport development projects. In fact, the only provision of Title 49 of the United States Code which is reproduced in the document is Section 40103, a provision which concerns FAA authority to regulate use of airspace, a fact which is not in dispute. On the other hand, other than one cryptic reference to the public hearing requirement of "49 USC 47106(c)" on page P-3 of the Draft EIS/R, this document does not summarize the relevant provisions of Federal law and policies contained in 49 U.S.C. § 47101 et seq. which have been enacted to ensure that airport development projects are consistent with the needs of the surrounding communities and protect the environment.

It is not generally understood by the many citizens who are impacted by the present, and proposed future, operations of Logan Airport that it is the policy of the United States that airport development projects should minimize, rather than increase, projected noise impacts on nearby communities (49 U.S.C. § 47101(a)(2)) and provide for the protection and enhancement of the quality of the environment (49 U.S.C. § 47101(a)(6)); that mitigation of existing noise impacts must be given a high priority in airport development projects which expand capacity (49 U.S.C. § 47101(c)); and that airport development projects should be planned in a cooperation effort with state and local officials (49 U.S.C. § 47101(g)(1)). None of these policies are alluded to in the Draft EIS/R.

These general policies are then reinforced by the more specific provisions of 49 U.S. C. § 47106 which ensure that airport development projects do not have significant adverse impacts on the surrounding region. For example, a project grant application may be approved by the Secretary of Transportation *only if* he is satisfied that "the interests of the community in or near which the project may be located have been given fair consideration" Second, 49 U.S.C. § 47106(c)(1)(A)(ii) gives the City of Boston, where the Massport airfield improvement project will be located, the right to petition the Secretary of Transportation about this project since the Massport Board does not have any voting representation from Boston, a right which is not discussed in the Draft EIS/R. Third, under 49 U.S.C. § 47106(c)(1)(A) the Secretary of Transportation may not approve the runway unless a public hearing is held to consider whether the runway is consistent with the community's planning objectives, as well as the economic, social and environmental effects of the runway. The public hearings held last week did not make this fact clear to the public. Finally, 49 U.S.C. § 47106(c)(C) prohibits approval of the project if it has significant adverse effects on natural resources (including recreation assets) unless there is no possible and prudent alternative and every reasonable step has been taken to minimize the adverse effects of the project.

The Draft EIS/R does not show that any cooperative planning efforts were made by Massport with the City of Boston and other local communities regarding which of the alternatives should be

65.2

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Page 3

selected by Massport as its preferred alternative. In fact, Massport repeatedly refused over an 18-month period to consult with the Community Advisory Committee about its choice of a preferred alternative. As you know, in October of 1997 AIR, Inc. specifically requested, in the enclosed letter to Massport Executive Director Peter Blute, an opportunity "to start the process of discussion" concerning airside improvements at Logan. This letter was never responded to by Mr. Blute or by anyone else at Massport or the FAA, to whom a copy was sent. Neither Massport nor the FAA consulted with the affected communities as to whether the selection of Alternative 1A would be consistent with the requirements of Federal law, particularly regarding minimization of noise and avoidance of disproportionate impacts to minority and low income communities.

65.4

Accordingly, we believe that it would be impossible for the Secretary of Transportation to be satisfied that "fair consideration" has been given to the interests of the surrounding communities when other alternatives, such as an aggressive peak period pricing program or further development of other existing commercial airfields, and Massport's own Hanscom Field, were not even evaluated. Furthermore, as documented in the comments of the Community Advisory Committee (CAC) dated March 29, 1999, which comments are endorsed and adopted by AIR, Inc., the project - particularly the proposed Runway 14/32 - will have excessive noise and other impacts on surrounding communities, in conflict with the national policy established in 49 U.S.C. § 47101(a) and (c).

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One other area of particular concern to AIR, Inc. is the document's failure to make a meaningful evaluation, as required by Federal law (including 49 U.S.C. § 47106(c)(1)(C)), of the impacts of the project on Section 4(f) resources. The document's apparent status as a "Draft Section 4(f) Statement" as well as a Draft EIS/R is not really made clear except on the page following REV-32 entitled "List of Preparers" at the end of volume I. The Preface (page P-1) and the discussion of the MEPA/NEPA Process and the Massport - FAA Roles on pages P-2 to P-5 do not indicate that the document is being circulated for comment as a Draft Section 4(f) Statement. The references at the top of each page and the Table of Contents to "Draft 4(f)" are confusing and not explained in the text.

65.8

The actual discussion of potential Section 4(f) impacts on pages 8-18 to 8-21 of the Draft EIS/R does not present sufficient data which shows the actual effects of the proposed project on the two historic sites identified in Chelsea. The bare determination by the FAA "that there are no feasible or prudent alternatives to the Preferred Alternative which would achieve the delay reduction, safety, transportation, noise distribution and other objectives of the Preferred Alternative" (page 8-21) is so conclusory as to be meaningless.

65.9

2. Environmental justice compliance. The draft EIS/EIR reflects significant, and fatal, short-comings in the FAA's ascertainment and evaluation of the impacts of this project on minority and low-income populations living adjacent to the project. The document shows that the FAA did not actively obtain the population and impact information required by the Executive Order and the DOT Order; the only specific data presented is noise data, which compares the projected noise

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impacts (which we believe are significantly understated) in particular communities to the study area as a whole, rather than showing the discrepancies among and between various communities which are impacted by the project; and other impacts, such as the impacts from air pollutants and odor, are not addressed. At best, the environmental justice information is presented in a way which suggests the FAA was simply "checking off" this requirement rather than attempting, in good faith, to provide a meaningful evaluation of the project on minority and low-income communities.

65.10

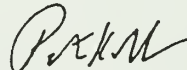
3. Preferential runway advisory system (PRAS). In Chapter 8 of the Draft EIS/R, Massport and the FAA maintain that the preferred alternative selected by Massport will help to obtain a better achievement of the goals of PRAS. In our opinion, however, that justification is misplaced. PRAS has not been a useful and reliable mechanism for equitable distribution of noise impacts for many years, due to increased volumes of air traffic and other historic and operational reasons. Achievement of the PRAS goals is not a relevant criterion for this project. If anything, the PRAS goals need to be revisited and understood by the public before any decisions should be made based upon PRAS.

65.11

4. Conclusion. AIR, Inc. respectfully requests that the Draft EIS/R be found inadequate by the Secretary of Environmental Affairs for all of the reasons stated above and in the comments of the CAC; that the FAA should reconsider its support for the project in light of the many deficiencies noted in the Draft EIS/R; and that the document should be withdrawn from further public consideration or processing at this time pending the development of a meaningful participatory process for evaluation of alternatives to the Runway 14/32 proposal.

65.12

Sincerely yours,



Peter L. Koff

cc: Arthur Pugsley, MEPA
AIR, Inc. members
Anastasia Lyman, Co-Chair, CAC

McGOWAN, ENGEL, TUCKER, GARRETT & SCHULTZ

(A PROFESSIONAL ASSOCIATION INCLUDING A PROFESSIONAL CORPORATION)

COUNSELLORS AT LAW

125 HIGH STREET

HIGH STREET TOWER, SUITE 2601

BOSTON, MASSACHUSETTS 02110

(617) 951-9980

TELECOPIER (617) 951-0048

PAUL A. McGOWAN, III
MARK D. ENGEL
THOMAS H. TUCKER
ROBERT W. GARRETT
STEPHEN SCHULTZ

October 16, 1997

Mr. Peter Blute
CEO & Executive Director
Massport
10 Park Plaza
Boston, MA 02116

Re: Peak period pricing and airside improvements

Dear Peter:

Airport Impact Relief, Inc. has asked that I write to you regarding the issues of peak period pricing and airside improvements, issues which have been made even more important by yesterday's *Wall Street Journal* story and your message in this week's *East Boston Sun Transcript*.

We are concerned by the lack of information which is being provided to us regarding the nature and timing of Massport's plans with respect to peak pricing. I gather from the *Journal* piece and other information I have heard that Massport has decided to move forward, together and at the same time, with peak period pricing and airside improvements (including Runway 14/32 and a centerfield taxiway), and that a Draft EIR will be published next month. I do not know if this information is accurate, but it would certainly be helpful to the community if some specific timetable was communicated as to when and what Massport proposes to do. Of course, I am surprised if the Massport plan would have a runway element going forward at the same time as the initiation of peak pricing. It had been our understanding that you were in agreement about "giving 'peak' a chance."

In another ironic twist to this issue, I was today called by someone in the Hanscom area asking whether Massport would be subject to local zoning requirements relative to a possible golf course and non-aviation development plans for Hanscom. The possibility that Massport would be giving up airport uses at Hanscom -- while it simultaneously moves to expand Logan's "operational flexibility" and ability to accommodate increased numbers of small and commuter aircraft using Logan -- is most troubling to us. The people of East Boston and Winthrop have always been sensitive to not shifting the problems of Logan Airport to the Hanscom area communities of Lexington, Concord, Bedford, and Lincoln. But at the same time, as long as Logan Airport growth is being discussed and Massport is considering options which we believe would increase the use of and impacts generated

McGOWAN, ENGEL, TUCKER, GARRETT & SCHULTZ

Mr. Peter Blute
October 16, 1997
Page 2

by Logan Airport, it is only fair and necessary for other alternatives to be explored and equally considered by your agency. Therefore, I would expect to see in any EIR for airside development at Logan a rigorous analysis of options for use of Hanscom, as well as the possibilities of a slot system and other demand management techniques for Logan, even if some of these would require FAA implementation. I am curious whether this kind of information will be available in your EIR and what studies have taken place regarding these various alternatives.

Your message in the *Sun Transcript* stated that you were committed to proceeding in good faith and in a spirit of cooperation to work with the Airport's neighbors to resolve difficult issues to the satisfaction of all concerned. I suggest that the difficult issues of peak period pricing, airside improvements, and alternatives to physical construction at Logan Airport should now be at the top of your list for discussion with the community. As one group which has a key role to play in these issues, we would like to start the process of discussion. If you would call me directly or ask Scott Kalker or another member of your staff to do so, we could hopefully agree upon the right way for this discussion to proceed.

I look forward to hearing from you.

Sincerely yours,



Peter L. Koff

cc: Scott Kalker, Esq., Chief Legal Counsel
Richard Lettieri, Esq., Ropes & Gray
Betty Desrosiers, Director of Aviation Planning and Development
Jane Garvey, Administrator, Federal Aviation Administration
Robert Bartanowicz, Regional Director, FAA
AIR, Inc. officers and active members

Letter 65

Airport Impact Relief, Inc. (McGowan, Engel, Tucker & Schultz)

Code	Topic 1	Topic 2	Comment	Response
65.1	Environmental Review Process	FAA/NEPA	...[T]his Draft EIS/R should ... discuss the Federal policies and future Federal approvals which will be necessary... with regard to this project.	Chapter 1 of this SDEIS/FEIR describes the Federal process undertaken for this project. Chapter 8 of the Supplemental DEIS/FEIR describes the federal permits and approvals required for the Preferred Alternative.
65.2	Environmental Review Process	FAA/NEPA	General policies enacted in 49 U.S.C. § 47101 are not alluded to in the Draft EIS/R.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR comply with applicable requirements of federal law.
65.3	Environmental Review Process	FAA/NEPA	The Public Hearing did not make clear to the public the requirements of 49 U.S.C. § 47106.	FAA statements at the commencement of the public hearing addressed pertinent requirements of 49 U.S.C. § 47106.

Code	Topic 1	Topic 2	Comment	Response
65.4	Environmental Review Process	Public Process	The Draft EIS/R does not show that any cooperative planning efforts were made by Massport with the City of Boston and other local communities regarding which of the alternatives should be selected by Massport as its preferred alternative...Neither Massport nor the FAA consulted with the affected communities as to whether the selection of Alternative 1A would be consistent with the requirements of Federal law, particularly regarding minimization of noise and avoidance of disproportionate impacts to minority and low-income communities.	<p>There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order r, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively.</p>
65.5	Alternatives	Peak Period Pricing	Other alternatives ... such as an aggressive peak period were not evaluated.	The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. Analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
65.6	Regional Transportation	Regional Airports	... further development of other existing commercial airfields, and Massport's own Hanscom Field, were not even evaluated.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The role of other commercial airports in New England is discussed in Chapter 2 of the Supplemental DEIS/FEIR.
65.7	Alternatives	Runway 14/32	... the proposed Runway 14/32 will have excessive noise and other impacts on surrounding communities, in conflict with the national policy ...	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
65.8	Open Space/ Parkland	Section 4(f)	The document fails to make a meaningful evaluation ... of the impacts of the project on Section 4(f) resources. The document's apparent status as a "Draft Section 4(f) Statement" as well as a Draft EIS/R is not really made clear ...	Section 4(f) requires the identification of resources that would be used by any alternative under consideration. Therefore, the identification of all park and historic resources currently affected by Logan Airport is not required for a Section 4(f) Evaluation. There are no parklands, historic properties or sites, or other Section 4(f) resources on the airfield in the area of the proposed runway and taxiway improvements. There are also no parklands identified in those areas where the 65 dB DNL contour for the Preferred Alternative extends beyond the 65 dB DNL contour for the No Action Alternative (Alternative 4). Therefore, the Preferred Alternative will have no direct or indirect impact on parklands. Refer to Sections 5.3 and 6.3 of the Supplemental DEIS/FEIR for a discussion of parklands relative to the Preferred Alternative.

Code	Topic 1	Topic 2	Comment	Response
65.9	Open Space/ Parkland	Section 4(f)	... discussion of potential Section 4(f) impacts ... does not present sufficient data which shows the actual effects of the proposed project on the two historic sites identified in Chelsea. The bare determination by the FAA "that there are no feasible or prudent alternatives to the Preferred Alternative which would achieve the delay reduction, safety, transportation, noise distribution and other objectives of the Preferred Alternative" is so conclusory as to be meaningless.	Refer to response to Comment 65.8.
65.10	Environmental Justice	Impacts	... the environmental justice information is presented in a way which suggests the FAA was simply "checking off" this requirement rather than attempting, in good faith, to provide a meaningful evaluation of the project on minority and low-income communities.	<p>The Environmental Justice analysis was significantly expanded in Section 6.8 of the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on Environmental Justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations from the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation.</p>
65.11	Noise	PRAS	Achievement of the PRAS goals is not a relevant criterion for this project.	Since the PRAS goals were developed in conjunction with Massport, the FAA, and neighboring communities, it has been Massport's policy to encourage the FAA to operate Logan Airport in a manner that would attempt to fulfill the PRAS goals. The use of the PRAS goals in this study is consistent with this policy.

Code	Topic 1	Topic 2	Comment	Response
65.12	Environmental Review Process	Public Process	... the document should be withdrawn from further public consideration ... pending the development of a meaningful participatory process for evaluation of alternatives to the Runway 14/32 proposal.	<p>There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

McGOWAN, ENGEL, TUCKER & SCHULTZ

(A PROFESSIONAL ASSOCIATION INCLUDING A PROFESSIONAL CORPORATION)

COUNSELLORS AT LAW

125 HIGH STREET

HIGH STREET TOWER, SUITE 2601

BOSTON, MASSACHUSETTS 02110

TELEPHONE (617) 951-9980

FACSIMILE (617) 951-0048

LETTER 66

PAUL A. McGOWAN, III

MARK D. ENGEL

THOMAS H. TUCKER

STEPHEN SCHULTZ

CATHY P. BROOKS

OF COUNSEL

PETER L. KOFF

MICHAEL ROITMAN

SUSAN GRANDIS BRANDER, P.C.

April 24, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attn: Arthur Pugsley

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Mr. Durand:

I am submitting the following supplemental comments on behalf of Airport Impact Relief, Inc. ("AIR, Inc.") in regard to the Draft Environmental Impact Statement/Report ("EIS/R") for the above project. I am hopeful that you will be able to accept these late comments which were delayed by my being out-of-town all of this past week.

First, I want to include one general observation about the lack of adequate maps and figures to identify the particular residential communities surrounding the Airport which would be impacted (positively or negatively) by the projects which Massport is proposing. The document repeatedly shows the Logan Airport facilities only to the extent of the Airport's property boundaries but without reference to the surrounding land areas and residential communities which lie next to or just beyond the surrounding waters. See, for example, the following figures: Figure 1.5-1 (existing runway layout) on page 1-15; Figures 1.5-2 through 1.5-6 (runway usage in various wind configurations) on pages 1-16 through 1-20; and the noise contours in Volume IV. These graphics minimize the impacts of the proposed projects on the persons who reside close to the Airport and make it more difficult for individuals to understand the potential effects of the projects on their particular neighborhoods. Figure 5.1-1 on page 5-4 does show the Airport in relation to the surrounding communities, but the areas are identified only generally ("East Boston," "Winthrop," and so forth) without more specific identifications of the particular neighborhoods. In contrast, Figure 5.3-2 on page 5-56, which shows the locations of air quality modeling receptors, does properly identify specific neighborhoods within Winthrop and East Boston, and South Boston. More extended use of these particular identifications would be helpful throughout the document.

66.1

McGOWAN, ENGEL, TUCKER & SCHULTZ

Secretary Bob Durand

April 24, 1999

Page 2

Second, our original comment letter dated April 16, 1999 neglected to comment upon two of the specific projects, in addition to the proposed Runway 14/32, which are of concern to AIR, Inc. and its members. The evaluation in the Draft EIS/R of the proposed Centerfield Taxiway does not adequately discuss the environmental impacts (both noise and odors) of this project, its relationship to increased Airport capacity (augmenting gate shortages) and expanded use of the airfield, and alternatives to the full Centerfield Taxiway, including constructing a shorter taxiway in the southern half of the airfield which would avoid adding more taxiing and queuing of aircraft in close proximity to the Bayswater/Constitution Beach area of East Boston and the Court Road neighborhood in Winthrop.

Finally, the discussion in the Draft EIS/R regarding lowering of the landing minimums on Runways 15R, 33L, 22L, and 27 is very limited and far from adequate. The Draft EIS/R does not fully disclose and properly evaluate the present conditions which limit lowering of the landing minimums on, we believe, three of the four runway ends. AIR, Inc. previously obtained from Massport, by means of a public documents request, a copy of the July 31, 1980 Agreement between Massport, the FAA, and the City of Boston regarding the installation of various lighting and instrumentation at the end of Runway 15R. In this Agreement the FAA states that it does not intend to lower landing minimums on Runway 15R, and will not do so in the future without a full environmental impact statement and public meetings. The Agreement references similar restrictions regarding lowering of the landing minimums on Runways 22L and 27.

The Draft EIS/R has no specific text discussion about this Agreement or the reasons particularly applicable to Runway 15R in the Draft EIS/R main volume (Volume I, pages 3-36 to 3-38) or Appendix D (Volume III). Based on the actual text of the Agreement for Runway 15R, and assuming the agreements for Runway 22L and 27 use similar language, the Draft EIS/R completely misstates the purpose of the agreements regarding these three runways when the Draft EIS/R states that when the instrument landing system equipment was installed on these runways "several years ago" the FAA "agreed to temporarily retain the existing approach minimums" See Volume I, page 3-38; Volume III, Appendix D, page 1. The EIS/R should provide, but does not, a full discussion of the reasons for the agreements, the concerns of residents who live close to the approach ends of these runways, the perceived and actual potential impacts of the proposed changes, alternatives, and appropriate mitigation.

AIR, Inc. respectfully requests that the Draft EIS/R be found inadequate by the Secretary of Environmental Affairs for the reasons stated above and in our previous comments.

Sincerely yours,



Peter L. Koff

cc: John Silva, FAA
AIR Inc. members

66.2

66.3

66.4

Letter 66

Airport Impact Relief, Inc. (McGowan, Engel, Tucker & Schultz)

Code	Topic 1	Topic 2	Comment	Response
66.1	Noise	Studies	Requests more extensive use of maps in identifying specific neighborhoods and to show relationship of surrounding communities to Logan on maps and figures.	Refer to the new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
66.2	Alternatives	Taxiway Improvements	The evaluation in the Draft EIS/R of the proposed Centerfield Taxiway does not adequately discuss the environmental impacts (both noise and odors) of this project, ...	Section 6.2 of the Supplemental DEIS/FEIR shows that there are small noise benefits from the construction of the Centerfield Taxiway. The principal effect of the Centerfield Taxiway is to reduce the number of aircraft waiting on the taxiways reducing ground noise and emissions for close in residents of East Boston and Winthrop. It also should eliminate aircraft landing on Runway 4R from waiting to cross Runway 4L and aiming their intake noise toward Constitution Beach. Section 6.4 of the Supplemental DEIS/FEIR discusses the air quality benefits of the Centerfield Taxiway.
66.3	Alternatives	Taxiway Improvements	Wants discussion of having shorter Centerfield taxiway only in southern half of airfield.	One of the major benefits of the Centerfield Taxiway is to provide an impeded path from the north sector of the airfield to the south. This will prevent Runway 4R arrivals from queuing in the northern sector, and will reduce queues for Runway 22L departures. Refer to Section 3.3.1 of the Supplemental DEIS/FEIR for more discussion of the Centerfield Taxiway's operational benefits.
66.4	Alternatives	Reduced Approach Minima	Requests expansion of discussion on lowering minimums and specifics on the July 31, 1980 agreement between Massport, the FAA and the City of Boston.	<p>The 1980 agreement between Massport and the FAA required an EIS analysis before any change in the minimums would be affected. The proposed reductions in minimums are analyzed in the EIS documents for the Airside Project.</p> <p>Reduced landing minimums provide for a safer approach by providing precision guidance at lower altitudes, and thus a safer approach. The reduced landing minimums do not change the approach path nor reduce the clearance between aircraft and the surface. Rather, they shift the location at which a missed approach decision is initiated closer to the airport. For Runways 27 and 22L, the reduced minimums will make the approach procedures flown by pilots more consistent with FAA standards in effect at most other airports. Reduced landing minimums will increase airfield safety by allowing operations more directly into the prevailing wind and will help improve PRAS goal achievement.</p>

Statement of Scott Godfrey
Director, Eastern Region
Air Transport Association of America
on the
Logan Airside Improvements Planning Project
08 APR 99

LETTER 67

My name is Scott Godfrey and I am the Director of the Eastern Region Office of the Air Transport Association of America which is headquartered in Washington, DC. The ATA represents the 23 major passenger and cargo airlines in the U.S..

Today, I am speaking for all these airlines, their respective employees and the passengers and shippers using Logan International Airport. ATA and the airlines serving Boston Logan Airport support the Logan Airside Improvements Planning Project in its entirety. As a partner with Massport, local officials, and community representatives throughout the comprehensive process leading to the submission of the Draft Environmental Impact Statement/Environmental Impact Report; we believe that the benefits to be garnered by all partners weigh heavily in support of the project.

The present operational posture within which the airport operates results in significant delays during certain wind conditions. The efficiency of the airport's operation is severely compromised during these times due to the lack of a runway configuration compatible to the operational requirements otherwise addressed by the available runways in all other wind situations. The obvious solution to this problem is the implementation of Massport's plan which includes the construction of runway 14/32.

67.1

The ATA can not stress enough the importance of the reduction of the current delays which plague Boston Logan Airport and the corresponding level of service which we can provide to the passengers and shippers utilizing the airport. It is also our position that the implementation of the entire project will lower the overall noise impact on the surrounding communities. This is due to the uni-directional orientation of the new runway and the efficiency gains which will cause a reduction of delayed late night operations which currently impact citizens at the most intrusive time of day.

67.2

Additionally, air traffic system and pilot operational safety benefits will be realized; a lessening of fuel emissions from delayed aircraft on the ground will result; and associated economic benefits for the greater Boston area will be gained.

67.3

In the interest of time, the ATA will submit a more detailed presentation of these and all the pertinent items via a written submission to the appropriate state (MEPA Office) and federal (FAA) agencies.

Letter 67

Air Transport Association of America

Scott Godfrey, Director Eastern Region

Code	Topic 1	Topic 2	Comment	Response
67.1	Alternatives	Runway 14/32	The obvious solution to this problem [delays] is the implementation of Massport's plan which includes the construction of Runway 14/32.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i> , published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i> . The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i> , published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
67.2	Alternatives	Preferred Alternative	... the implementation of the entire project will lower the overall noise impact on the surrounding communities.	Comment noted.
67.3	Air Quality	Impacts	... a lessening of fuel emissions from delayed aircraft on the ground will result; ...	Comment noted.



Air Transport Association

LETTER 68

April 21, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge ST
20th floor
Boston, MA 02202

**Subject: Logan Airside Improvements Planning Project
Boston-Logan International Airport**

Reference: Draft EIS/EIR

Dear Sir:

Pursuant to my testimony on April 8, 1999, at the second public hearing on this subject, the following comments are submitted by the Air Transport Association (ATA).

As Director of the Eastern Region office of the ATA, which represents the 23 major passenger and cargo airlines of the U.S., we support the improvements in the Logan Airside Improvements Planning Project in their totality as delineated in the preferred Alternative 1A.

ATA throughout the years has been an active participant with Massport and the FAA, working to enhance the efficiency of Logan air traffic operations which have suffered increasingly high levels of delay. The ATA Eastern Region, through its participation in the Airside Review Committee, has worked to insure that proposed improvements, specifically, this project, were coordinated with all concerned public and private constituencies. It is, therefore, our position that Massport has adequately fulfilled all necessary and reasonable requirements through the comprehensive processes leading to the submission of the subject document.

Due to the physical limitations of Logan Airport which have not been altered since 1977, and the increasing level of delays, Massport is justified in proposing this project to address

68.1

the root problem of airport efficiency and delay reduction. The airline industry acknowledges the overwhelming cost to our passengers and shippers which results from the current unacceptable level of delay. The ATA cannot stress enough the importance of the reduction of these delays and the corresponding change in the level of service we can provide. Additionally, if not adequately addressed now, we believe the delay situation will only worsen.

Supporting data for the preceding statements is adequately covered in the subject document.

Specifically addressing Alternate 1A, we submit the following:

a. All items addressing the taxiway improvements offer an increase to the level of safety regarding surface movement of aircraft as well as an increase in the efficiency of these operations. Because of a more efficient ground operation, a corresponding decrease in engine noise and fuel emissions will be experienced. This represents a significant benefit to the entire airport community and airport neighbors.

68.2

b. The proposed reduction in ILS landing minimums offers two main benefits: it will permit aircraft to land during weather conditions which currently prohibit such operations resulting in delays; and will allow the use of additional runway configurations. This will give controllers greater flexibility in runway assignment and present a greater opportunity to attain the legally designated PRAS goals.

68.3

The level of safety is increased by reducing controller and pilot workload associated with executing unplanned actions including holding and diverting.

68.4

c. The construction of uni-directional Runway 14/32 is the keystone of the project. Due to the overwhelming amount and excessive length of delays caused by northwest wind conditions, the proposed runway offers the single most significant initiative to reduce these delays. The operational posture within which the airport operates now results in significant delays during weather and wind conditions as described in the subject document. The efficiency of the airport's operation is compromised during these times due to the lack of a runway configuration compatible with the operational requirements otherwise addressed by the available runways in all other wind conditions.

68.5

Letter 68

Air Transport Association of America

Scott Godfrey, Director Eastern Region

Code	Topic 1	Topic 2	Comment	Response
68.1	Environmental Review Process	MEPA	It is, therefore, our position that Massport has adequately fulfilled all necessary and reasonable requirements through the comprehensive processes leading to the submission of the subject document.	Comment noted.
68.2	Alternatives	Taxiway Improvements	Specifically addressing Alternate 1A, ... Because of more efficient ground operations, a corresponding decrease in engine noise and fuel emissions will be experienced. This represents a significant benefit to the entire airport community and airport neighbors.	Comment noted.
68.3	Alternatives	Reduced Approach Minima	Specifically addressing Alternate 1A, ... The proposed reduction in ILS land minimums offers two main benefits: it will permit aircraft to land during weather conditions which currently prohibit such operations resulting in delays;	Comment noted.
68.4	Alternatives	Preferred Alternative	Specifically addressing Alternate 1A, ... This will give controllers greater flexibility in runway assignment and present a greater opportunity to attain the legally designated PRAS goals.	Comment noted.
68.5	Alternatives	Runway 14/32	Specifically addressing Alternate 1A, ... Due to the overwhelming amount and excessive length of delays caused by northwest wind conditions, the proposed runway offers the single most significant initiative to reduce these delays.	Comment noted.

Alliance of Boston Neighborhoods

CURRENT MEMBER NEIGHBORHOODS
Aberdeen & Reservoir Civic Association • Allston Civic Association
Bay Village Neighborhood Association, Inc. • Beacon Hill Civic Association
Chester Square Neighborhood Association • Claremont Neighborhood Association, Inc.
Community Alliance of Mission Hill • Cosmopolitan Neighborhood Association
Dorchester Neighborhood Association • Ellis Neighborhood Association, Inc.
Fenway Civic Association • Jeffries Point Harborside Neighborhood Association
Leather District Neighborhood Association • Neighborhood Association of the Back Bay, Inc.
North End/Waterfront Residents Association • Pilot Block Neighborhood Association, Inc.
Prudential Center Residents Association • Roxbury Neighborhood Council
Seaport Alliance for a Neighborhood Design • St. Botolph Citizens' Committee, Inc.
Worcester Square Area Neighborhood Association
ALL CITY NEIGHBORHOODS ARE INVITED TO JOIN THE ALLIANCE.

Harriet Tubman House • 566 Columbus Avenue • Boston, MA 02118 • voice: 617-267-6356 • facsimile: 617-357-5916

LETTER 69

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE A No. 10458
100 Cambridge St. 20th Floor
Boston, MA 02202

April 23, 1999

The Alliance of Boston Neighborhoods strongly opposes the construction of Runway 14/32.

We are dismayed that Massport is violating its legal protected commitments to the affected neighborhoods. Public agencies are obligated to protect the public interest as they carry out their specific missions; this proposal fails to honor the public trust, at the continuing expense of the residents of nearby communities.

This runway will increase noise and pollution in Boston neighborhoods, including East Boston, Charlestown, South Boston, South End, Beacon Hill, Back Bay, Roxbury, Jamaica Plain, and possibly Hyde Park, Roslindale and West Roxbury. We urge a more equitable distribution of the burdens of economic growth. This is particularly true when the affected neighborhoods have benefited least from such growth.

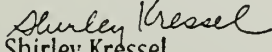
The city and regional transportation infrastructure is not capable of supporting the expansion expected with this runway, and indeed, expected regardless of this runway. Neither visitors nor local travelers will benefit if they cannot get to and from the airport.

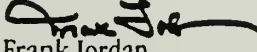
Massport's cost-benefit analysis of the proposed project values every minute of passenger time spent in delays, however brief, without adequate concern for city life. The cumulative costs to residents, in productivity lost due to interrupted communication and disruption of sleep, loss of outdoor recreational opportunity, respiratory and other health problems, decreased property values, and many other flight impacts are not calculated.

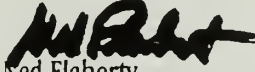
The proposed runway is a short term, local solution for a basic regional problem. The damage to afflicted neighborhoods will be permanent; however, the capacity controversy will face us again in a few years.

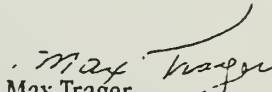
A regional plan for all transportation modes must be developed, considering new high-speed rail, and other airports and potential transit improvements. Peak-hour pricing, small-aircraft and freight redistribution, and other methods for rationalizing airport utilization must be examined. Massport must join with other public agencies as appropriate to develop a comprehensive, long-range regional transportation plan.

Sincerely,


Shirley Kressel
President


Frank Jordan
Vice President


Ned Flaherty
Secretary


Max Trager
Treasurer

Letter 69

Alliance of Boston Neighborhoods

Code	Topic 1	Topic 2	Comment	Response
69.1	Environmental Review Process	MEPA	... this proposal fails to honor the public trust, at the continuing expense of the residents of nearby communities.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPP</i> (previously the GEIR) and its updates. Massport and FAA have complied with all applicable state and federal requirements.
69.2	Noise	Impacts	This runway will increase noise and pollution in Boston neighborhoods, ...	Refer to response to Comment 69.1.
69.3	Ground Transportation	Access to Logan Airport	The city and regional transportation infrastructure is not capable of supporting the expansion expected with this runway, and indeed, expected regardless of this runway. Neither visitors nor local travelers will benefit if they cannot get to and from the airport.	<p>Massport has in place an extensive Ground Access Management Plan, the primary goals of which are to: increase the overall efficiency of the metropolitan transportation system through interagency coordination; increase annual air passenger HOV mode share to 35.2 percent by the time annual air passengers reach 37.5 million; reduce employee reliance on commuting alone by private automobile; provide adequate long-term parking within the limits of the Logan Airport Parking Freeze; and improve management of ground access and infrastructure through technology. Key achievements in reaching those goals include: Establishment of the Logan Airport Transportation Management Association (TMA). Massport provided subsidies for TMA members on Logan Express and MBTA. TMA members ride the Rowe's Wharf Water Shuttle for free; hired professional TMA firm to operate the Logan Airport TMA.</p> <p>Record ridership on the Logan Express bus service (exceeded over one million passengers in 1998 and 1999) and planning for a fourth Logan Express location.</p> <p>Construction of the Woburn Regional Transportation Center which will include 900 new parking spaces for Logan Express (construction completed in 2000)</p> <p>Planning for the Airport Intermodal Transit Connector which will provide a direct link between Logan Airport and South Station/Red Line. Initiation of the Logan DART bus service between Logan Airport and South Station.</p> <p>Participation with the MBTA in planning for the redesigned new Airport Station to include wide escalators, flight information monitors, and other air passenger amenities.</p> <p>Continued the operation of free shuttle buses between Airport Station, Water Shuttle dock, and terminals.</p> <p>To "Provided a dedicated DART bus dock at South Station with direct service to the airport.</p> <p>Implemented Logan Direct service from the South Shore.</p> <p>Continued marketing and advertising of HOV services through use of 1-800-23LOGAN telephone service and other media.</p> <p>Continued implementation of commercial vehicle lane, Neptune Road exit ramp peak period forced turnaround, local street closures, and traffic volume restrictions at Maverick Street.</p> <p>Continued traffic monitoring, curbside monitoring, and traffic control improvements.</p> <p>Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan.</p>

Code	Topic 1	Topic 2	Comment	Response
69.4	Alternatives	Runway 14/32	... cost-benefit analysis ... The cumulative costs to residents, in productivity lost due to interrupted communication and disruption of sleep, loss of outdoor recreational opportunity, respiratory and other health problems, decreased property values, and many other flight impacts are not calculated.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.
69.5	Alternatives	Runway 14/32	The proposed runway is a short-term, local solution for a basic regional problem.	The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR provide an evaluation of the regional airports at T. F. Green/Providence, Manchester, and Worcester Regional and their potential impacts on Logan Airport. Hanscom Field is the region's premier general aviation facility and accommodated over 180,000 aircraft operations in 1998. The regional airports are expected to accommodate an increasing share of the overall growth in air travel demand within the greater Boston area. This will provide some relief to the growth pressures at Logan Airport. Nevertheless, the proposed Logan Airport Airside Project is necessary and provides clear benefits at current traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.
69.6	Regional Transportation	Passenger Rail	A regional plan for all transportation modes must be developed, considering new high-speed rail, and other airports and potential transit improvements.	Massport's analysis of options to Logan Airport is comprehensive and reflects all the major recommendations of various regional planning studies that have been conducted over the last decade. These include expansion of the regional airports and development of high-speed rail in the Boston-New York market. Chapter 2 of the SDEIS/FEIR provides a description of regional transportation mode alternatives.
69.7	Alternatives	Non-Construction Alternatives	Peak-hour pricing, small-aircraft and freight redistribution, and other methods for rationalizing airport utilization must be examined.	The airside analysis indicates that PPP would produce minimal delay reduction benefit in the current operating environment at Logan Airport while imposing significant costs on regional carriers and the communities that they serve. In contrast, the proposed unidirectional Runway 14/32 would produce immediate delay reduction benefits that will increase in the future as forecast activity levels grow. While the regional airports at Manchester and T.F. Green/Providence have experienced exceptional traffic growth over the past several years, traffic at Logan Airport has continued to grow. In the future, continued development at the regional airports should relieve some of the traffic growth pressures at Logan Airport, resulting in a reduced rate of traffic growth. Nevertheless, options to Logan Airport do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. The potential diversion of cargo operations was not specifically analyzed because cargo operations account for only two percent of aircraft activity at Logan Airport and since most all-cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport. However, all cargo operations were included in the future fleets analyzed in the Airside Project. Additionally, some cargo is now being diverted to regional airports as indicated by the strong growth in cargo services and air cargo activity at the regional airports.

MEPA PUBLIC HEARING
APRIL 8, 1999

GOOD EVENING. I'M ED FREN, GENERAL MANAGER FOR AMERICAN AIRLINES HERE AT LOGAN AIRPORT. I'M HERE TONIGHT TO UNDERSCORE AMERICAN'S SUPPORT FOR THE MASSPORT AIRSIDE IMPROVEMENT PROJECT. WE BELIEVE THAT A NEW UNI-DIRECTIONAL RUNWAY FOR REGIONAL AIRCRAFT WILL BENEFIT ALL CARRIERS AT LOGAN.

A NEW RUNWAY WILL HELP REDUCE DELAYS AT LOGAN AND ALLOW THE AIRPORT TO OPERATE MORE EFFICIENTLY WHEN THE WINDS ARE NORTH-WESTERLY. THIS ENABLES THE AIRPORT TO OPERATE THE THREE-RUNWAY CONFIGURATION THAT IS REQUIRED TO HANDLE THE DEMAND.

70.1

A PLANE THAT IS LATE IN LEAVING LOGAN LIKELY WILL BE LATE IN ARRIVING AT ITS DESTINATION. AND, WHETHER WE TALK ABOUT A COMPLEX, INTENSIVE HUB AND SPOKE OPERATION, OR A TIGHTLY-SCHEDULED POINT-TO-POINT NETWORK, IT DOESN'T TAKE MUCH TO THROW AN ENTIRE DAY'S SCHEDULE OUT OF WHACK.

AS DELAYS INCREASE, THE COSTS OF PROVIDING RELIABLE SCHEDULES TEND TO RISE EVEN FASTER, WHICH CAN RESULT IN HIGHER FARES. AND AS ANYONE WHO HAS EXPERIENCED A CROWDED CHAOTIC TERMINAL DURING A SEVERE WEATHER EVENT KNOWS, ANYTIME AN AIRLINE'S CAPACITY IS RESTRICTED, THE QUALITY OF SERVICE WE CAN OFFER OUR CUSTOMERS DECLINES DRAMATICALLY.

IMPROVING THE EFFICIENCY OF AN AIRLINES' OPERATION AT LOGAN WILL ALSO ENABLE THE CARRIER TO CREATE A MUCH LESS ENVIRONMENTALLY OFFENSIVE PRODUCT. WITH LESS WAITING TIME ON THE GROUND WE'LL DEFINITELY REDUCE FUEL BURN AND EMISSIONS.

70.2

AMERICAN HAS A LONG AND RICH HISTORY IN BOSTON. WE BEGAN SERVICE HERE BACK IN 1927 WITH A NONSTOP FLIGHT TO NEW YORK. THE AIRCRAFT - A SINGLE-ENGINE FOKKER -- CARRIED SIX PASSENGERS, A PILOT AND A CO-PILOT. IT TOOK TWO AND A HALF HOURS TO REACH NEW YORK.

TODAY, AMERICAN OPERATES MORE THAN 70 DAILY FLIGHTS AND CARRIES THOUSANDS OF PEOPLE TO DESTINATIONS THROUGHOUT THE UNITED STATES, AND TO PUERTO RICO, LONDON, ENGLAND AND PARIS, FRANCE.

ON JUNE 1. WE'LL CELEBRATE TWO MAJOR EVENTS AT LOGAN.
WE'LL LAUNCH NONSTOP SERVICE TO SEATTLE USING OUR NEW "NEXT
GENERATION" BOEING 737-800 AND WE'LL MARK THE 40TH
ANNIVERSARY OF THE VERY FIRST JET FLIGHT AT LOGAN.

TODAY, AMERICAN IS A TOP CARRIER AT LOGAN, WITH 4.5 MILLION
PASSENGERS COMING THROUGH OUR GATES EACH YEAR. AND NEARLY
2,500 AMERICAN AIRLINE'S EMPLOYEES CALL BOSTON HOME.

"WE MEAN BUSINESS IN BOSTON" IS NOT ONLY OUR SLOGAN, BUT
IT'S A COMMITMENT TO PROVIDING QUALITY SERVICE TO OUR
PASSENGERS AND CUSTOMERS.

BUILDING A NEW RUNWAY WILL HELP US LIVE UP TO OUR
COMMITMENT. IT IS GOOD FOR LOGAN AIRPORT AND IT WILL BE GOOD
FOR THE AIRLINES THAT SERVE LOGAN.

THANK YOU.

Letter 70

American Airlines

Ed Freni, General Manager

Code	Topic 1	Topic 2	Comment	Response
70.1	Purpose and Need	Delays	A new runway will help reduce delays at Logan and allow the airport to operate more efficiently when the winds are north-westerly.	Comment noted.
70.2	Air Quality	Emissions Reduction	With less waiting time on the ground we'll definitely reduce fuel burn and emissions.	Comment noted.

Back Bay Photo Imaging
800 Boylston St.
Boston, MA 02199

April 23, 1999

LETTER 71

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge St. 20th. Floor
Boston, MA 02205

Dear Mr. Pugsley:

As a member of the Greater Boston Chamber of Commerce I recently received a letter from the organization's President and CEO requesting that members write to you in support of expanding Logan Airport (see copy enclosed). I am writing to inform you that I do not support Logan runway (14/32) expansion.

Much has been written in local newspapers both supporting and opposing Logan Airport expansion. I will not bore you by reiterating what you already know, but to take this opportunity to emphasize the need for responsible leadership. The air traffic problems currently facing Logan Airport did not spring up overnight. Increased air traffic has been the topic of discussions for several years. Where has the Massachusetts Port Authority been? Certainly they have had time to put together a long-term plan to address air traffic issues. Instead they recommend adding another runway, which by all acknowledgment is a short-term solution lasting up to five years! What then? I request that you deny environmental permitting and encourage the Massachusetts Port Authority to fulfill their responsibility by making an effort to develop a truly long-term solution.

The enclosed letter includes several generalized statements that sound as though the vitality of Massachusetts' economic future hinges upon the single event regarding Logan Airport expansion. I truly hope this is not the case, otherwise it is time for all of us to look outside the Commonwealth for a better living environment.

For other citizens of the Commonwealth and myself I thank you in advance for your time and efforts regarding this matter.

Sincerely,


Ray Molinaro
President

cc: Paul Guzzi, President and CEO
Greater Boston Chamber

71.1

Code	Topic 1	Topic 2	Comment	Response
71.1	Environmental Review Process	MEPA	I request that you deny environmental permitting and encourage the Massachusetts Port Authority to fulfill their responsibility by making an effort to develop a truly long-term solution.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.



BEACON HILL CIVIC ASSOCIATION, INC.

...serving the community for over seventy-five years

April 22, 1999

LETTER 72

74 Joy Street
Boston, Massachusetts 02114
(617) 227-1922
(617) 227-7959 fax
bhccivic@aol.com

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Bob Durand, Secretary
Executive Office of Environmental Affairs, Attention MEPA Office
Arthur Pugsley, IV, EOEa No. 10458
Commonwealth of Massachusetts
100 Cambridge Street, 20th floor
Boston, MA 02202

Re: Logan Airside Improvement Planning Project: DEIR/DEIR

Dear Secretary Durand:

Based upon our review of documentation and our participation in the CAC and ARC, the Beacon Hill Civic Association (BHCA) reiterates opposition to Massport's proposal to construct a new runway at Logan Airport. While the arguments for and against Massport's plan are many and complex, the following is a brief summary of our opposition:

1. We need a long-term, encompassing plan now; we need much more than a short-term, 20% fix. Massport's plan affords partial, temporary relief which does not effectively address the long-term, growing problem. Massport's plan is based on obsolete weather data, its delay model is different from and unreconciled with the FAA's calculations, and its plan forecasts only 11 years, probably only 5-7 years after completion. Massport tries to justify the runway in order to increase throughput and decrease delays in bad weather conditions. The new runway will increase actual operations annually, thereby expanding current capacity. Operations are projected to continue to grow without limits; and delays are also projected to continue to increase from the temporary, slightly decreased, level right after the new runway, eventually exceeding currently levels within a very few years. In the future operations will continue to increase without limits. Postponing a more encompassing solution will make it more difficult, painful, and expensive to achieve, if ever, at a later date. Why are we allowing a more massive pile up to develop and ignoring the responsible solution?

72.1

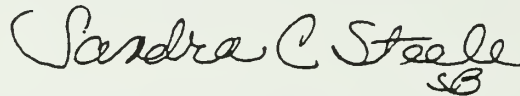
72.2

Bob Durand

April 22, 1999

The Association seeks your assistance in requiring Massport to develop an environmentally responsible, long-term plan which facilitates air traffic while respecting the health and well-being of all those affected.

Very truly yours,

A handwritten signature in cursive script that reads "Sandra C Steele". There is a small, stylized mark below the signature that appears to be "SB".

Sandra C. Steele, President

SCS/kp

c.c. Mayor Thomas Menino, City of Boston
U.S. Senator Edward Kennedy
U.S. Senator John Kerry
U.S. Representative J. Joseph Moakley
U.S. Representative Barney Frank
U.S. Representative Michael E. Capuano
Senator Stephen Lynch
Senator Robert E. Travaglini
Representative Paul Demakis
Representative Salvatore DiMasi
Governor Paul Cellucci
City Councilor Thomas M. Keane, Jr.
Boston City Council
Community Advisory Committee to Massport
Vincent A. Scarano, Mgr. Of Airports Division, FAA New England
Secretary, Office of Environmental Affairs
Environmental Protection Agency
Airside Review Committee
The Beacon Hill Times
The Beacon Hill Chronicle
The Boston Tab
The Boston Herald
The Boston Globe
The Boston Business Journal
The Wall Street Journal

Letter 72

Beacon Hill Civic Association

Sandra C. Steele, President

Code	Topic 1	Topic 2	Comment	Response
72.1	Analysis Assumptions/ Methodologies	Planning Period	We need a long-term, encompassing plan now; we need much more than a short-term, 20% fix.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
72.2	Delay	Model	... its delay model is different from and unreconciled with the FAA's calculations, and its plan forecasts only 11 years, probably only 5-7 years after completion.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport. The planning scenarios for 29, 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 1999 to 2020 time frame.

OFFICERS

BEN LEONE, **President**
JAMES PAGE, **Vice President**
LAURA K. LEONE, **Secretary**
KRISTIN MASSUCCO, **Treasurer**



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DAVID DIBARRI
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BEACHMONT NEIGHBORHOOD ASSOCIATION, INC.

P.O. Box 204
Revere, MA 02151
(781) 289-9424
E-Mail: beachmont@yahoo.com
Website: www.BNA8.com

LETTER 73

April 22, 1999

Secretary of Environmental Affairs
Attn: MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02201

Re: Logan Airside Improvements Planning Project (Draft EIS/EIR)

Dear Mr. Pugsley,

Please accept the attached document as formal comment from the Officers & Directors of the Beachmont Neighborhood Association with regard to Massport's Logan Airside Improvements Planning Project. We submit this document to your attention, before 5p.m. on April 23, 1999, as directed by Massport in a coverletter on the Draft EIS/EIR.

Thank you for your consideration of our position.

Sincerely,

Ben Leone
President

enclosure

cc: Mayor Robert J. Haas, Jr.
Honorable City Council of Revere
Honorable State Delegation
John Silva, Manager of Environmental Programs, Airports Division,

OFFICERS

BEN LEONE, **President**
JAMES PAGE, **Vice President**
LAURA K. LEONE, **Secretary**
KRISTIN MASSUCCO, **Treasurer**



DIRECTORS

DAVID DIBARRI
DARLENE JONES
GRACE KRUSE
TIMOTHY LESLIE

BEACHMONT NEIGHBORHOOD ASSOCIATION, INC.

P.O. Box 204
Revere, MA 02151
(781) 289-9424
E-Mail: beachmont@yahoo.com
Website: www.BNA8.com

Pursuing A Better Quality of Life Under The Crowded Skies

The Beachmont Neighborhood Association (hereafter referred to as "BNA") on April 14, 1999, sponsored an open meeting on the issue of Massport's Logan Airside Improvement Planning Project (hereafter referred to as the "Proposal"). We remain grateful for Massport's accommodation to our request for their participation at our neighborhood meeting.

Held at the Beachmont V.F.W., the meeting attracted 65 attendees representing mostly Revere residents but mixed with a few from other affected communities. The purpose of the meeting was three-fold: 1) to inform interested residents about the Proposal, which is a very significant and rather complicated issue; 2) to afford interested residents the opportunity to discuss the Proposal's ramifications; and, 3) to provide a forum for questions to both opponents and proponents. A team of Massport spokespersons delivered a detailed explanation of the Proposal with the audience responding in general disagreement. Overall, the program was informative and interesting but, at the same time, quite disturbing to most of the audience.

First, the BNA believes the Proposal as presented is flawed in that it includes at least two projects that we consider to pose direct threat to the Beachmont neighborhood. The concerning projects are: 1) the introduction of Runway 14/32; and, 2) the reduction in aircraft approach minimums.

As for Runway 14/32, we are concerned by the potential posed for increased air traffic and the noise and air pollution its establishment would bring. The promise of a brief reprieve from current noise levels for Revere and a few other communities is far from a justification for the BNA to support it. **As for the reduction in aircraft approach minimums**, we are concerned with what we perceive to be the serious safety factor in lowering the ceiling for planes landing in conditions of low visibility. We also predict that, as pilots would advance to a lower altitude before learning of a need to abort landing plans, the exhaust fumes and noise associated with resuming full-throttle to lift away would present a worsening of our already beleaguered situation.

The BNA favors economic vitality for Greater Boston's business communities. We favor energized focus on moving Boston toward a "world class" city. We are also keenly aware of the vital role air traffic plays in such development.

..... more

73.1

73.2

The BNA favors a more equitable distribution of noise levels among affected areas.

73.3

The BNA, in fact, favors an efficiently-operated first class airport at Logan International Airport, but stands opposed to such development when the burden of shouldering it is constantly placed on the few unfortunate communities that surround the airport. We believe this to be unfair and unjust.

Simply put, we are opposed to expansion at Logan International Airport because we already have more than enough traffic, air and noise pollution. The BNA is convinced the Proposal is destined to bring more pollution. We are convinced, too, that the next proposal (which the current Proposal, if accepted, will necessitate) will bring even more. We simply do not want any more.

In order to avoid ending negatively, the BNA offers the following recommendations. We hope that Massport can continue to work with affected communities in order to:

- 1) Devise a regional plan for aircraft operations in eastern Massachusetts, both for immediate and long-term future needs;
- 2) Embark upon a fair, impartial and complete evaluation of Hanscom Air Field and Worcester Airport as to what roles they each are capable of assuming in the short term to alleviate Logan's congestion, and in the long-term as alternative airports;
- 3) Study what further can be done to create and then mandate quieter aircraft; and,
- 4) Agree with sincerity to select locations as sites for three (3) additional airports to be developed within eastern Massachusetts.

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*The BNA is an organization founded to serve as a focal point for community action dedicated to improving the quality of life in Beachmont and to joining in common effort with other groups for such purpose.

.....end

Letter 73

Beachmont Neighborhood Association

Code	Topic 1	Topic 2	Comment	Response
73.1	Alternatives	Runway 14/32	As for Runway 14/32, we are concerned by the potential posed for increased air traffic and the noise and air pollution its establishment would bring.	The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.
73.2	Alternatives	Reduced Approach Minima	As for the reduction in aircraft approach minimums, we are concerned with what we perceive to be the serious safety factor in lowering the ceiling for planes landing in conditions of low visibility.	Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport will not increase noise levels. Aircraft will follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach decision must be made will be moved closer to the airport. Since missed approaches rarely occur, they have no discernible effect on the cumulative noise. For example, reducing the Runway 22L decision height to 200 feet moves the maximum noise point to approximately 3,000 feet from touchdown which is further from populated areas in East Boston than the current maximum noise point. Although categorically excluded from NEPA review, modeling of the changes in runway availability from reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result were included in the Airside Project in compliance with an earlier agreement among Massport, the FAA and the City of Boston.
73.3	Noise	Impacts	... favors a more equitable distribution of noise levels among affected areas.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
73.4	Regional Alternatives	Regional Airports	Devise a regional plan for aircraft operations in eastern Massachusetts, both for immediate and long-term future needs;	Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.

11/20/2015 10:05 AM

April 23, 1999

LETTER 74

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley – EOE No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

As a financial securities industry executive who uses Logan Airport quite frequently, I am writing to strongly support the Massachusetts Port Authority's proposal regarding the construction of runway 14/32. In addition, as the Vice Chairman of the Greater Boston Chamber of Commerce's Economic Development and Transportation Committee, I am extremely concerned that the regional economy will suffer greatly if the proposal is not approved.

Because I personally use commercial airlines flying out of or into Logan as many as six times a week, I am acutely aware of the problems caused by the increasing delays. As the eleventh-ranked U. S. airport in terms of operations, Logan currently ranks sixth in the nation in flight delays. I understand that last year alone, such delays amounted to 120,000 hours and cost approximately \$319 million. As just one recent example, I was delayed over three hours last week in returning from New York City on the Delta Shuttle when one flight was cancelled and another delayed on the ground, as well as enroute, because windy conditions required Logan to operate with only one runway. As a result, I missed a business appointment in Boston, --a circumstance which could jeopardize my firm's ability to compete for a significant assignment. This was hardly an isolated incident and it is the type of problem that many of my Bear Stearns colleagues who visit Boston and our 200 employees who are based in the Boston office experience all the time. My own flights in and out of Logan have been delayed literally dozens of times because of similar conditions during the past year. Many, if not all of these delays would likely have been eliminated if runway 14/32 existed.

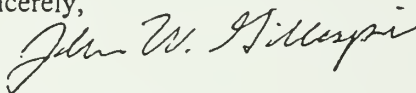
As the major airport in New England, Logan is a key driving force in the regional economy, with an impact of \$5 billion annually. It employs more than 15,000 people and supports over 100 airport-related businesses. Continuing our regional economic growth and insuring the future fiscal health of the Commonwealth and surrounding states are

74.1

highly dependent on the success of the runway 14/32 project. As New England faces greater competition both nationally and abroad, having an airport that operates efficiently will become increasingly critical to our future.

Unfortunately, regional transportation measures will not provide sufficient relief for the problem of Logan delays. While Amtrak high-speed rail and growth at other regional airports are also necessary, they cannot begin to deal with the projected demand for air travel to Boston during the next decade. The runway 14/32 initiative, together with the entire Logan modernization project, thus strongly deserves your approval.

Sincerely,

A handwritten signature in cursive script, reading "John W. Gillespie".

John W. Gillespie
Managing Director

Letter 74

Bear, Stearns & Co., Inc.

John W. Gillespie, Managing Director

Code	Topic 1	Topic 2	Comment	Response
74.1	Purpose and Need	Delay	...I am extremely concerned that the regional economy will suffer greatly if the proposal is not approved.	Section 1.3 of the Supplemental DEIS/FEIR discusses the importance of Logan Airport to the regional economy.

**BOSTON
CONVENTION
& VISITORS
BUREAU**

LETTER 75

America's Walking City

April 12, 1999

Mr. Arthur Pugsley
Secretary of Environmental Affairs - MEPA
100 Cambridge Street - 20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

Re: EOE A 10458

I am writing on behalf of the 1,200 businesses and companies that are members of the Greater Boston Convention & Visitors Bureau, Inc.

We wish to be recorded in favor of the proposed unidirectional runway project 14-32 at Boston Logan International Airport.

This proposed runway will significantly reduce delays at Logan Airport and allow it to operate much more efficiently.

In the short term, the proposed runway project is the most realistic way in which to address Logan's delay problem. Even with the dramatic growth of regional airports in Providence and Manchester and the potential of Worcester and Portland Airports, as well as high-speed rail between Boston and New York, Logan will continue to be the airport of choice for business travelers and convention delegates.

If Logan's well-documented delay problems are not addressed, the ability of the region's visitor industry to compete for business will be compromised; and the economic benefits it generates will be threatened.

With major new transportation infrastructure already underway and a new convention center and new hotels planned for the Seaport District, Boston and Cambridge will be well positioned to compete for major national and international meetings and conventions. Those bids, however, may not be successful if the region's major airport, Logan International Airport, has a performance record of not operating in an efficient way. Meeting planners in evaluating bids look at the ability of the convention center to house their convention, the number and availability of hotel rooms in close proximity to the convention center and the ability of the airport to operate efficiently both on the

75.1

75.2

Mr. Arthur Pugsley – MEPA Office
Page 2
April 12, 1999

groundside and airside. Without the proposed runway, our convention and meetings business will be threatened; and we could lose out on much of the business that the new convention center in the Seaport District is expected to generate.

If there is any additional information you need, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick B. Moscaritolo". The signature is fluid and cursive, with a large, stylized initial "P" and "M".

Patrick B. Moscaritolo
President and CEO

mg

Letter 75

Greater Boston Convention & Visitors Bureau

Patrick B. Moscaritolo, President & CEO

Code	Topic 1	Topic 2	Comment	Response
75.1	Regional Transportation	Regional Airports, Passenger Rail	...the proposed runway project is the most realistic way in which to address Logan's delay problem. Even with the dramatic growth of regional airports in Providence and Manchester and the potential of Worcester and Portland Airports, as well as high-speed rail between Boston and New York, Logan will continue to be the airport of choice for business travelers and convention delegates.	Comment noted.
75.2	Purpose and Need	Delay	If Logan's well-documented delay problems are not addressed, the ability of the region's visitor industry to compete for business will be compromised; and the economic benefits it generates will be threatened.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. Section 1.32 of the Supplemental DEIS/FEIR discusses the importance of Logan Airport to tourism and the regional economy.

THE BOSTON HARBOR ISLANDS ADVISORY COUNCIL
BOSTON HARBOR ISLANDS NATIONAL RECREATION AREA

408 Atlantic Avenue
Suite 228
Boston, MA 02110-3350

LETTER 76

April 22, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE A No. 10458
100 Cambridge Street
20th Floor
Boston, MA 022025

John C. Silva
Manager, Environmental Programs
Airport Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Project Name:	Logan Airside Improvements Planning Project
Project Location:	Boston-Logan International Airport-Boston / Winthrop
Project Proponents:	Massachusetts Port Authority, Federal Aviation Administration
Project Number:	EOEA No. 10458

Dear Mr. Pugsley and Mr. Silva:

On behalf of the Boston Harbor Island Advisory Council I wish to communicate two motions that were passed at the April 8, 1999 meeting of the Council. The Boston Harbor Island Advisory Council is a twenty-eight-member council appointed by the Director of National Park Service. The Advisory Council was formed to advise and make recommendations to the Boston Harbor Islands Partnership with respect to the development and implementation of an integrated management plan and the operation of the newly created Boston Harbor Islands National Recreation Area.

Motion 1: The Advisory Council cannot support the Draft Environmental Impact Report (EIR)/ Draft Environmental Impact Statement (EIS) filed by Massport and the Federal Aviation Administration if the addition of a new runway and associated taxiway leads to more overflights of the Boston Harbor Islands.

76.1

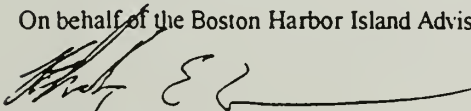
Motion 2: The Advisory Council requests that Massport and the Federal Aviation Administration withdraw the Draft Environmental Impact Report (EIR)/ Draft Environmental Impact Statement (EIS) until a more comprehensive analysis of the benefits and impacts the proposed runway and associated taxiway can be presented. Additionally, there should be greater involvement by a spectrum of interested parties to seek a long-term solution to the regions transportation needs.

76.2

76.3

If you have any questions please do not hesitate to call. Thank you.

On behalf of the Boston Harbor Island Advisory Council



Philip E. Lemnios
Member

CC: All Members of the Boston Harbor Advisory Council

Letter 76

The Boston Harbor Islands Advisory Council

Philip E. Lemnios, Member

Code	Topic 1	Topic 2	Comment	Response
76.1	Alternatives	Preferred Alternative	...cannot support the Draft Environmental Impact Report (EIR)/...if the addition of a new runway and associated taxiway leads to more overflights of the Boston Harbor Islands.	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
76.2	Environmental Review Process	MEPA	...requests that Massport and the Federal Aviation Administration withdraw the Draft Environmental Impact Report (EIR)/Draft Environmental Impact Statement (EIS) until a more comprehensive analysis of the benefits and impacts the proposed runway and associated taxiway can be presented.	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p>

Code	Topic 1	Topic 2	Comment	Response
76.3	Environmental Review Process	Public Process	...there should be greater involvement by a spectrum of interested parties to seek a long-term solution to the regions transportation needs.	<p>Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system.</p> <p>There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

BRITISH AIRWAYS

April 8, 1999

LETTER 77

Secretary of Environmental Affairs
ATTN: MEPA
Mr. Arthur Pugsley
EOEA #10458
100 Cambridge St. - 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

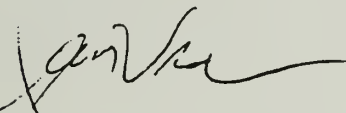
British Airways wishes to express its support for the series of airside improvements currently proposed by Massport. In an effort to reduce delay and improve efficiency on Logan's airfield, we support the following projects:

- ⇒ Construction of an uni-directional reliever runway 14/32 for local over the water operations.
- ⇒ Construction of a centerfield taxiway to reduce taxiway congestion.
- ⇒ Realignment and extension of existing taxiways to enhance airfield safety.
- ⇒ Reduction of approach minimums on runways to upgrade Logan Airport to industry standards.

77.1

On behalf of our Customers, 553,943 passengers who traveled through Logan on British Airways in 1998 and who annually ship over 22 million tons of cargo and mail in and out of Logan Airport, we strongly reiterate our support for the Logan Airside Improvement Planning Project (EOEA #10458).

Sincerely,



Gail Visentin
Director Passenger & Cargo Operations

Letter 77

British Airways

Gail Visentin, Director Passenger &
Cargo Operations

Code	Topic 1	Topic 2	Comment	Response
77.1	Alternatives	Preferred Alternative	[British Airways]...support(s).... Construction of an uni-directional reliever runway 14/32.... Construction of a centerfield taxiway.... Realignment and extension of existing taxiways.... Reduction of approach minimums....	Comment noted.

Building and Construction Trades Council of the Metropolitan District

AFFILIATED TO THE

BUILDING AND CONSTRUCTION TRADES DEPARTMENT

A.F.L.-C.I.O.

LETTER 78

TERRITORIAL JURISDICTION

Arlington, Belmont, Boston, Burlington, Cambridge, Canton, Chelsea, Dedham, Everett, Malden, Medford, Melrose, Milton, Norwood, Reading, Revere, Somerville, Stoneham, Wakefield, Walpole, Westwood, Winthrop, Winchester, Woburn, and the Islands of Boston Harbor.

Joseph W. Nigro Jr.
Secretary-Treasurer
General Agent

Secretary of Environmental Affairs
Attn: MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

April 22, 1999

The Metropolitan Boston Building Trades Council, AFL-CIO representing 35,000 men and women is writing today in full support of the Massachusetts Port Authority's Airside Improvement plan for Logan International Airport. The Building Trade Unions firmly believe this project is necessary to reduce delays, improve the quality of life of our members and provide much needed employment opportunities.

Delays at Logan are consistently among the worsts in the U.S. These delays are not only inconvenient, they are costly. In 1998 delays at Logan cost airline and their passengers nearly \$310 million. These losses ultimately affect the livelihood of many working men and women as it impedes the ability of Boston and the region to compete in a global economy.

A major component of the Airside Improvement project, Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas of East Boston's Bayswater, Revere's Beachmont and Winthrop's Court Road and Point Shirley as well as South Boston's Castle Island area. The new unidirectional Runway shifts 75,000 flights over water rather than over communities. It also allows noise impacts to be spread more equitably across communities. The proposed centerfield taxiway and other improvements would further enhance air quality by reducing aircraft idling and queuing on the airfield and reduce ground noise from taxing aircraft to adjacent neighborhoods.

With an annual economic impact of \$5 billion, Logan International Airport is directly responsible for creating more than 15,000 jobs in this area, many of which are the hard working men and women of the Trade Unions.

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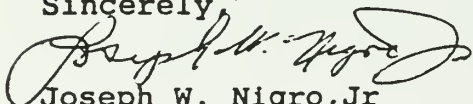
78.4

Page 2
Logan Airport
April 22, 1999

It is therefore, without reservation, the Boston Building Trades Council, AFL-CIO wholeheartedly support's Airside Improvements at Logan Airport and looks forward to the projects approval.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joseph W. Nigro, Jr.", written in a cursive style.

Joseph W. Nigro, Jr
Secretary Treasurer/General Agent

Letter 78

Building and Construction Trades Council of the Metropolitan District

Joseph W. Nigro, Jr. Secretary Treasurer/General Agent

Code	Topic 1	Topic 2	Comment	Response
78.1	Purpose and Need	Delay	Delays at Logan are consistently among the worst in the U.S...In 1998 delays at Logan cost airline and their passengers nearly \$310 million.	Comment noted.
78.2	Alternatives	Runway 14/32	A major component of the Airside Improvement project, Runway 14/32, provides significant noise relief for our members living in the highest impacted noise areas....	Comment noted.
78.3	Alternatives	Runway Use	...The new unidirectional Runway shifts 75,000 flights over water rather than over communities. It also allows noise impacts to be spread more equitably across communities.	Comment noted.
78.4	Air Quality	Taxiway Improvements	The proposed centerfield taxiway and other improvements would further enhance air quality....	The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.



Barnstable Municipal Airport
North Ramp
Hyannis, Massachusetts 02601
508-790-3122
508-778-1870 FAX
Reservations (800) 352-0714
(800) 635-8787

LETTER 79

Testimony for the Federal Aviation Administration with comments submitted pursuant to MEPA by Daniel A. Wolf, President of Cape Air/Nantucket Airlines
April 7, 1999

John Silva, Federal Aviation Administration

Arthur Pugsley, Massachusetts Environmental Policy Act

Mr. Moderator, my name is Daniel Wolf. I am the founder and President of Cape Air/Nantucket Airlines. We provide year round service between Boston, Cape Cod and the Islands of Martha's Vineyard and Nantucket. In addition, we are the only year round air service provider to many of the remote communities we serve. Our passengers rely on access to Logan International Airport. We fly approximately 150,000 passengers between Boston and the Cape and Islands each year. In the summer months a large proportion of these passengers are summer visitors connecting from other flights. It is important to emphasize that an equally large percentage of our passengers are residents and business people who need to reach Logan for travel, business and medical necessity.

I am a pilot and my strength is aviation. In fact, I dedicated the last 20 years of my life to the airline industry. A decade ago I founded Cape Air. Although they are not present, sitting with me are the other 400 employee owners of Cape Air who have worked tirelessly to make Cape Air the largest independent regional airline in the country. Today I speak for them and the passengers who depend on us.

We state very simply that construction of proposed runway 14/32 makes perfect aviation sense. Currently Logan Airport has the dubious distinction of being one of the top airports in the country in terms of aircraft delays

The primary reason for this is very simple. Under certain wind conditions the capacity at Logan Airport drops from 120 operations per hour to as few as 60. The result,

major delays, lost business time, missed connections and higher travel costs for both the industry and the passengers.

Although the proposed runway would increase efficiency and safety it would not increase the number of overall operations. I understand that is a major concern from a number of the communities in the area.

Another issue of course is noise. Once again aviation sense must come into play here. The proposed runway would re-direct the noise impact over the water thus away from some communities that are currently experiencing a disproportionate noise impact.

Alternatives to Logan Airport as a departure point have also been discussed. As someone whose business relies heavily on connecting passengers from Logan I need to point out that passengers arriving to Massachusetts from other parts of the world need Logan to make their connections to Cape Cod and the Islands. Air transportation markets are not automatically transferable. The use of alternative regional air transportation facilities should be encouraged but developing new air transportation markets with adequate ground transportation and other support infrastructure takes time.

We do encourage and support a regional approach to alternative regional air transportation issues. In fact, in an ongoing effort to pull some of our traffic out of Logan Airport, Cape Air provides service to New Bedford and Providence and invests considerable time and money in supporting the operation of the New Bedford Airport.

Such efforts should not be at the expense of the ongoing safety and effectiveness of the operations at Logan.

We believe that Massport has done a thorough job of evaluating the range of delay reduction tools outlined in Alternative 1A of the Draft Environmental Impact Statement filed with the MEPA Unit of the Executive Office of Environmental Affairs. Implementing the outlined improvements will allow the airport to operate at maximum efficiency regardless of wind direction.

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Letter 79

Cape Air/Nantucket Airlines

Daniel A. Wolf, President, Cape Air, Testimony

Code	Topic 1	Topic 2	Comment	Response
79.1	Purpose and Need	Delays	...That construction of proposed runway 14/32 makes perfect aviation sense. Currently Logan Airport has the dubious distinction of being one of the top airports in the country in terms of aircraft delays. The primary reason for this is very simple. Under certain wind conditions the capacity at Logan Airport drops from 120 operations per hour to as few as 60.	Comment noted.
79.2	Alternatives	Runway 14/32	Although the proposed runway would increase efficiency and safety it would not increase the number of overall operations.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. The construction of unidirectional Runway 14/32 would prevent the significant drop in airfield capacity that now occurs during northwest wind conditions. The runway would not increase Logan Airport's normal operating capacity of approximately 120 operations per hour which is available nearly 80 percent of the year, but rather would allow this capacity to be maintained more consistently.
79.3	Noise	Runway Use	The proposed runway would re-direct the noise impact over the water, thus away from some communities that are currently experiencing a disproportionate noise impact.	Comment noted.
79.4	Regional Transportation	Regional Airports	Alternatives to Logan Airport as a departure point have also been discussed...passengers arriving to Massachusetts from other parts of the world need Logan to make their connections to Cape Cod and the Islands. Air transportation markets are not automatically transferable.	Comment noted.
79.5	Regional Transportation	Regional Airports	We do encourage and support a regional approach to alternative regional air transportation issues.	Comment noted.
79.6	Alternatives	Preferred Alternative	We believe that Massport has done a thorough job of evaluating the range of delay reduction tools outlined in Alternative 1A of the Draft Environmental Impact Statement... Implementing the outlined improvements will allow the airport to operate at maximum efficiency regardless of wind direction.	Comment noted.



100 Barnstable Road
Barnstable Municipal Airport
North Ramp
Hyannis, Massachusetts 02601
508-790-3122
508-778-1870 FAX
Reservations (800) 352-0714
(800) 635-8787

LETTER 80

Secretary of Environmental Affairs
Attention: MEPA Unit
Mr. Arthur Pugsley-EOEA #10458
100 Cambridge St. 20th floor
Boston, MA 02202

RE: Draft Environmental Impact Report for the Logan Airside Improvements
Planning Project

Dear Mr. Secretary:

For ten years Cape Air has been the critical air link between Logan International Airport and several Massachusetts communities. Currently we provide year round scheduled air service from Logan, New Bedford Airport, and T.F. Green Airport in Rhode Island to Cape Cod and the Islands of Nantucket and Martha's Vineyard. Access to Logan is critical to the communities we serve. This year Cape Air will transport more than 150,000 passengers between Logan Airport and Cape Cod and the Islands.

Cape Air actively supports Massport's efforts to improve the safety and efficiency of Logan operations. For the past three years I have participated in the environmental review of this project. I attended nearly all of the Airside Review Committee meetings and provided economic and operational data on our company for use in technical analysis of delay conditions, the assessment of alternatives and the development of case studies. Prior to my participation in this project I was a member of the Second Airport Commission charged with assessing the Commonwealth's needs and opportunities for creating a second major airport. As an airline president as well as a pilot, I have hands on, practical knowledge of the delay conditions at Logan and am familiar with Massport's efforts to address the Commonwealth's long-term air transportation needs. Based on these experiences I believe that Massport has undertaken a thorough and credible assessment of alternatives to reduce delays at Logan and at the same time is working to develop increased use of regional transportation facilities to help relieve pressure at Logan.

Logan's location on the waterfront and within city limits poses landside and airside challenges, but also offers the potential environmental benefits of moving air traffic over water. Logan experiences wind conditions that severely reduce Logan's capacity from 120 operations an hour to 90 or as low as 60 per hour. I agree with Massport's analysis which indicates the proposed airside improvements would both

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equitably redistribute noise and at the same time shift existing noise over water and away from affected communities.

In Alternative 1A, Massport proposes 14/32 as a unidirectional runway for this purpose. This plan also includes taxiway improvements and reduced approach minimums. Massport's analysis demonstrates that these actions will have meaningful delay reduction results without causing negative environmental impacts on the surrounding communities.

80.4

We are pleased that Alternative 1A does not include peak period pricing. Massport's analysis demonstrates that peak hour pricing would not be effective in reducing current or projected delays at Logan. The DEIR/S demonstrates peak period pricing would not address delays caused by wind conditions that are most effectively helped by Runway 14/32. Massport demonstrates that peak period pricing will not address delay conditions at Logan. This is particularly true since delays are due to adverse wind conditions and not a result of airline over-scheduling.

80.5

The DEIR/S documents the negative impact peak period pricing would have on Cape Air and the remote destinations we serve. Peak period pricing would increase our landing fees by more than 1000%. We could not absorb a cost increase of this magnitude. Our response would have to be a drastic reduction or elimination of service to Logan Airport. This would have a direct impact on the 400 Massachusetts residents we employ and the hundreds of thousands of passengers, businesses and institutions we serve. Loss of air service to the region would mean staggering economic losses for the region's tourism industry, the Cape's emerging high technology sector and the countless other businesses that rely on air service.

In addition, Cape Air strongly supports the communities we serve in a variety of ways including low cost medical flight service to Boston from our remote destinations. With peak hour pricing not only would the communities lose that benefit but since we are the only airline providing air service to the town of Provincetown that community would be severely impacted.

80.6

Compounding the economic and public welfare issues are the resulting environmental impacts from adding 450,000 passengers we carry to already congested roadways including the Southeast Expressway, Route 3, and Route 6.

The often cited claim that carriers such as Cape Air are the major cause of delays at Logan is not substantiated by the extensive delay modeling and analysis completed for the DEIR/S. This analysis concludes that Cape Air's operational characteristics limit the impact on Logan delays. Since Cape Air's contribution to the delay problem at Logan is relatively minor, the elimination of Cape Air's operations by the use of peak hour pricing brings with it many negative consequences without any significant commensurate benefit to delay reduction.

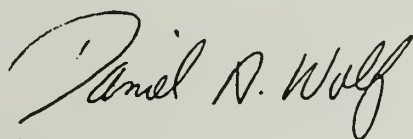
Logan is an important resource to all New England communities. Political considerations have dominated the public discussion of the DEIR since it's release in February. While important, these political considerations should not obscure the operational and environmental benefits embodied in Massport's preferred alternatives.

If viewed objectively, the analysis contained in the DEIR can lead to actions that will improve the safety and efficiency of operations at Logan and thereby serve the best interests of the Commonwealth. It would be unfortunate if we squandered this

80.7

opportunity which would not only improve the efficiency and safety of Logan Airport, but also produce beneficial environmental results.

Thank-you for the opportunity to comment.

A handwritten signature in cursive script that reads "Daniel A. Wolf". The signature is fluid and elegant, with the first name "Daniel" being the most prominent part.

Daniel A. Wolf
President, Cape Air

Letter 80

Cape Air/Nantucket Airlines

Daniel A. Wolf, President

Code	Topic 1	Topic 2	Comment	Response
80.1	Purpose and Need	Delay	Cape Air actively supports Massport's efforts to improve the safety and efficiency of Logan operations.	Comment noted.
80.2	Purpose and Need	Delay	...I believe that Massport has undertaken a thorough and credible assessment of alternatives to reduce delays at Logan....	Comment noted.
80.3	Noise	Impacts	...I agree with Massport's analysis which indicates the proposed airside improvements would both equitably redistribute noise and at the same time shift existing noise over water and away from affected communities.	Comment noted.
80.4	Noise	Impacts	Massport's analysis demonstrates that these actions will have meaningful delay reduction results without causing negative environmental impacts on the surrounding communities.	Comment noted.
80.5	Alternatives	Peak Period Pricing	Massport's analysis demonstrates that peak hour pricing would not be effective in reducing current or projected delays at Logan...This is particularly true since delays are due to adverse wind conditions and not a result of airline over-scheduling.	Comment noted.
80.6	Alternatives	Peak Period Pricing	The DEIR/S documents the negative impact peak period pricing would have on Cape Air and the remote destinations we serve...the elimination of Cape Air's operations by the use of peak hour pricing brings with it many negative consequences without any significant commensurate benefit to delay reduction.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP exemption program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.
80.7	Alternatives	Preferred Alternative	...the analysis contained in the DEIR can lead to actions that will improve the safety and efficiency of operations at Logan and thereby serve the best interests of the Commonwealth.	Comment noted.



LETTER 81

John D. O'Brien
Chief Executive Officer

April 15, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
Cambridge Street
20th Street
Boston, MA 02202

Dear Secretary Durand:

I have represented Cape Cod business interests on the Airside Review Committee (A.R.C.) for the past three years.

The business community on Cape Cod strongly supports the Logan improvement program as outlined in MassPort's plan submitted to you for MEPA review.

As you know, we here on the Cape and Islands have developed an economic development strategic plan that has as its fundamental purpose a balance between environmental concerns and the development of more stable year round jobs.

As part of our effort we have endeavored to stretch out our tourism season by using more sophisticated marketing techniques aimed at a target market. We also are augmenting this effort with a recruitment initiative designed to attract more technology companies to locate here on Cape Cod.

In order to be successful we need reliable on time air service.

Economic Development Division
307 Main Street - Suite 2
Hyannis, MA 02601-4043
Tel: 508-790-4980
Fax: 508-790-1889
www.capecodchamber.org
ecdev@capecodchamber.org

Convention & Visitors Bureau
307 Main Street - P.O. Box 790
Hyannis, MA 02601-0790
Tel: 508-862-0700
Fax: 508-862-0727
URL: www.capecodchamber.org
Email: info@capecodchamber.org

Our international visitor market is growing and this market alone requires efficient reliable connections to our Cape and Islands Airports.

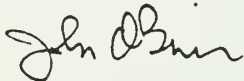
As a member of the A.R.C. Committee I participated in the numerous working sessions and came away with the belief that the MassPort plan including runway 14/32 is essential to our economic well being.

Additionally, as I suggested and pressed for early on, the use of peak period pricing is not a workable solution at Logan and it would absolutely devastate our small carriers based on Cape Cod.

The MassPort staff and the community activists basically agree that Cape Air would essentially be put out of business by the use of peak period pricing.

The business community on Cape Cod urges approval of MassPort's overall plan to reduce delay at Logan with the taxiway improvements and the construction of runway 14/32.

Sincerely,



John O'Brien
Chief Executive Officer

cc Mr. John Silva
Manager, Environmental Program
Airports Division F.A.A.
New England Division
12 New England Executive Park
Burlington, MA 01803

JDO:sb

81.1

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81.3

Letter 81

Code	Topic 1	Topic 2	Comment	Response
81.1	Alternatives	Runway 14/32	...I participated in the numerous working sessions and came away with the belief that the Massport plan including runway 14/32 is essential to our economic well being.	Comment noted.
81.2	Alternatives	Peak Period Pricing	...the use of peak period pricing is not a workable solution at Logan and it would absolutely devastate our small carriers based on Cape Cod. The Massport staff and the community activists basically agree that Cape Air would essentially be put out of business by the use of peak period pricing.	The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. Analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR.
81.3	Purpose and Need	Delay	The business community on Cape Cod urges approval of Massport's overall plan to reduce delay at Logan with the taxiway improvements and the construction of runway 14/32.	Comment noted.



CAPE COD ECONOMIC DEVELOPMENT COUNCIL

3225 MAIN STREET
P.O. BOX 226
BARNSTABLE, MA 02630
(508) 362-3828
FAX: (508) 362-3136

LETTER 82

April 15, 1999

Secretary Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attention: Arthur Pugsley, MEPA Unit

John C. Silva, Manager
Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

EOEA #10458

Dear Sirs:

On behalf of the Cape Cod Economic Development Council (CCEDC) I would like to comment on the Draft Environmental Impact Report/Statement (DEIR/S) for the Logan Airside Improvements Planning Project. The CCEDC is the economic development arm of Barnstable County and, as such, is responsible for promoting policies in support of a year-round economy for the Cape. The Council consists of eleven private sector representatives and three representatives of local government.

The economic and environmental well being of Cape Cod's residents and businesses depends on continued safe and efficient air transportation access to Logan. Logan airport is a vital link to the region for visitors that support the Cape's tourism industry. Reliable air transportation access to Logan is also a component in public and private efforts to diversify the regional economy and create quality year-round employment opportunities for residents.

The Council believes that Alternative 1A as presented in the DEIR/S provides the most direct and effective actions for controlling delays and increasing operating efficiency. The preferred alternative would address weather-related conditions that account for the vast majority of delays at Logan. It would also result in a greater number of overwater operations and increase Massport's ability to achieve community noise goals.

Regarding peak pricing, the Council recognizes that Massport has conducted a thorough assessment of delay reduction benefits of peak period pricing, as well as the impacts on air carriers to the region and the regional economy. Through this assessment Massport has concluded that peak period pricing would not be an effective response to current or projected delay conditions at Logan.

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The Council strongly opposes the imposition of peak period pricing at Logan Airport at any time. Peak period pricing would unfairly penalize the carriers providing service to Cape Cod, even though it has been demonstrated that the smaller aircraft used by those carriers have a negligible impact on delays because of their use of alternative runways. The Council notes Massport's finding of the "real possibility" that peak period pricing could put carriers serving this region out of business.

82.2

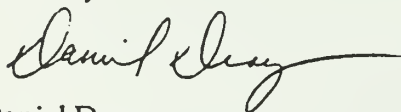
For the communities of the Outer Cape, the loss of air carrier service would fundamentally threaten the health and safety of residents by removing a critical community transportation resource. Cape Air currently provides a medical care flight service that many residents rely on. For these residents, the closest ambulance drive is an hour away to Cape Cod Hospital and two-and-a-half hours away to Boston.

82.3

In addition to staggering economic and health and safety impacts, peak period pricing would also generate harmful environmental impacts. The resulting loss of air transportation would force more cars onto local roadways, which are already stressed beyond capacity during the summer season.

Thank you for the opportunity to comment on the Logan DEIR.

Sincerely,

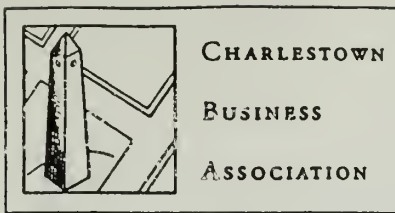


Daniel Dray
Administrator
Cape Cod Economic Development Council

cc: Honorable A. Paul Cellucci, Governor
Mr. Peter Blute, Massachusetts Port Authority
Mr. Mark Robinson, Chairman, Massport Board of Directors
Massachusetts Congressional Delegation
Cape Cod Delegation to the Massachusetts General Court
Cape Cod Board of Selectman
Barnstable Town Council
Cape Ports
Cape Cod Commission
Mary Pat Flynn, Cape Cod Economic Development Council, Chairman
David Willard, Cape Cod Economic Development Council, Vice-Chairman

Letter 82

Code	Topic 1	Topic 2	Comment	Response
82.1	Alternatives	Preferred Alternative	...believes that Alternative 1A as presented in the DEIR/S provides the most direct and effective actions for controlling delays and increasing operating efficiency.	Alternative 1A is the preferred alternative.
82.2	Alternatives	Peak Period Pricing	...strongly opposes the imposition of peak period pricing at Logan Airport at any time.	The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. Analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR.
82.3	Alternatives	Peak Period Pricing	The Council notes Massport's finding of the "real possibility" that peak period pricing could put carriers serving this region out of business. ...the loss of air service would fundamentally threaten the health and safety of residents.... Cape Air currently provides a medical care flight service that many residents rely on. ...peak period pricing would also generate harmful environmental impacts. The resulting loss of air transportation would force more cars onto local roadways, which are already stressed beyond capacity during the summer season.	Refer to response to comment 82.2.



LETTER 83

April 23, 1999

Secretary of Environmental Affairs Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor, Room 2000
Boston, MA 02202

Attention: MEPA Unit, Arthur Pugsley

RE: Logan Airside Improvements Planning Project - EOEA #10458 DEIS/R

By Facsimile: (617) 727-1598

Dear Secretary Durand:

On behalf of the Charlestown Business Association, I wish to express our concern over the application made by the Massachusetts Port Authority (Massport) and the Federal Aviation Administration (FAA) to develop a new runway, 14/32, at Boston-Logan International Airport (Logan) in Boston, Massachusetts and over the information contained in the DEIS/R which supports its development. We believe that the proposed runway expansion carries deep impacts on the quality of life in the surrounding communities and in Charlestown, in particular, because of noise and increases in air traffic. The proposed runway 14/32 has the potential to negatively impact and damage our businesses as well.

It is for these reasons that the Board of Directors of the Charlestown Business Association voted recently to oppose development of the new runway, 14/32, at Logan. The Charlestown Business Association (CBA), founded in 1986, is an organization of approximately 180 members, including office, industrial, retail, restaurant, and recreational businesses and non-profit institutions, most located within Charlestown itself. The CBA gives businesses a voice in the Charlestown community, and its mission is to better the community through commerce.

Our reading of the Draft Environmental Impact Statement/Report Volume 1 did not alleviate our concerns about impacts of the proposed runway on our community and on the impacted communities. The following are particular areas of concern.

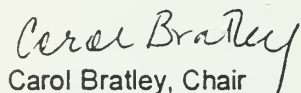
1. **Need for a Regional Network.** A basic premise of the DEIS/R is that "The transportation services provided at Logan -- both passenger and air cargo- are essential to the economic success of the entire New England Region." (ES-6). By using the word "essential", the proponents ignore the fact that Logan is but one element in the regional transportation network. By using the word "essential", they focus only on increasing capacity at Logan rather than on seriously analyzing the regional capacity and growth potential of the network of airports at Worcester, Hanscom Field, T.F. Green Airport, RI, Manchester, NH, and Bradley International Airport, Hartford, CT.

83.1

2. **Need for Runway by Runway Numbers:** The DEIS/R did not appear to list the increases in numbers of arrivals and departures runway by runway, that is by direction, under the various alternatives. It is not possible to determine the increases or decreases in activity level with construction of R14/32. However, earlier reports presented to Massport's Airside Review Committee on April 2, 1997, for the Environmental Impact Study on Logan Airport Improvements show the changes in arrivals and departures runway by runway under the R14/32 build and no-build scenario. Why was this same information not readily available in Volume 1 of the DEIS/R? From a Charlestown point of view, the 1997 document certainly makes the case for our not supporting construction of R14/32. 83.2
3. **Delays:** The information on delays does not indicate the number of delays caused by weather-related problems at other airports. For example, many of us have experienced winter delays when connecting flights are delayed by snow at other distant airports. What part of the total delay is caused by such weather problems elsewhere? 83.3
4. **Soundproofing Mitigation:** Massport's willingness to soundproof buildings should not be used to support arguments for expansion of Logan runways. For businesses that operate out of doors and for residents who use their outdoor spaces around their homes, how can you soundproof the out-of-doors? There is a loss in property value attributable to the increase in noise and air traffic that cannot be mitigated by soundproofing. Where is this loss in property value given attention in the DEIS/R? 83.4
5. **Is Runway 14/32 always going to be uni-directional.** While the uni-directional R14/32 as proposed has negative impacts on the Charlestown community and its business community, we wonder how many years it will be before Massport makes the argument for a two-directional runway 14/32. A two-directional runway would have a far more devastating environmental impact on Charlestown than the uni-directional runway, which we oppose as it is proposed. 83.5

We recognize the importance of the airport to the regional economy, but we side with the quality of life and economic viability issues which are "essential" to us. We believe that Massport and the FAA must take a regional approach to solving the airport growth and usage problems, among other issues cited above. Until that happens, we can find little, if anything, in the proposed R14/32 plan that we support. 83.6

Sincerely,



Carol Bratley, Chair
Charlestown Business Association

cc: Senator Thomas F. Birmingham, State House
Representative Eugene L. O'Flaherty, State House
City Councilor Paul Scapicchio, District One, Boston City Hall

Letter 83

Charlestown Business Association

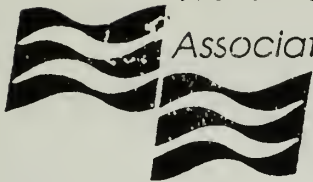
Carol Bratley, Chair

Code	Topic 1	Topic 2	Comment	Response
83.1	Regional Transportation	Regional Airports	...[the proponents] focus only on increasing capacity at Logan rather than on seriously analyzing the regional capacity and growth potential of the network of airports at Worcester, Hanscom Field, T.F. Green Airport, RI, Manchester, NH, and Bradley International Airport, Hartford, CT.	<p>The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR provide an evaluation of the regional airports at T. F. Green/Providence, Manchester, and Worcester Regional and their potential impacts on Logan Airport. Hanscom Field is the region's premier general aviation facility and accommodated over 180,000 aircraft operations in 1998. The regional airports are expected to accommodate an increasing share of the overall growth in air travel demand within the greater Boston area. This will provide some relief to the growth pressures at Logan Airport. Nevertheless, the proposed Logan Airport Airside Project is necessary and provides clear benefits at current traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.</p>
83.2	Delay	Model	...earlier reports presented to Massport's Airside Review Committee on April 2, 1997, for the Environmental Impact Study on Logan Airport Improvements show the changes in arrivals and departures runway by runway under the R14/32 build and no-build scenario. Why was this same information not readily available in Volume 1 of the DEIS/R?	Arrivals and departures by runway end for all future fleets and project alternatives were included in Appendix H of the Draft EIS/EIR. The same information for the 2015 37.5M High RJ fleet is included in Appendix C of the Supplemental DEIS/FEIR.
83.3	Delay	Model	The information on delays does not indicate the number of delays caused by weather-related problems at other airports...What part of the total delay is caused by such weather problems elsewhere?	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport delays within the context of delays at other United States airports.</p>

Code	Topic 1	Topic 2	Comment	Response
83.4	Noise	Sound Insulation	Massport's willingness to soundproof buildings should not be used to support arguments for expansion of Logan runways...how can you soundproof the out-of-doors?	<p>Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i>. Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including:</p> <ul style="list-style-type: none"> Noise abatement and runway use restrictions; Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation; Encouraging growth at Worcester Regional Airport and other alternative airports; and Monitoring and improving achievement of PRAS goals.
83.5	Alternatives	Runway 14/32	Is Runway 14/32 always going to be uni-directional.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. Refer to Section 8.7 of the Supplemental DEIS/FEIR Draft Section 61 Findings, and the discussion in Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.</p>
83.6	Regional Transportation	Regional Airports	We believe that Massport and the FAA must take a regional approach to solving the airport growth....	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside improvements to be implemented under the Preferred Alternative at Logan Airport.</p>

Chelsea

Waterfront
Association



Jeff Buck
President

Telephone
884-3763

Marie Iacono
Vice President

Richard Smigielski
Secretary / Treasurer

LETTER 84

To: Robert Durand
Secretary of Executive Office of Environmental Affairs
April 22, 1999

Dear Robert,

The Chelsea Waterfront Association is a non-profit, non-partisan, neighborhood improvement association dedicated to giving its members a voice in the policies that affect the Chelsea waterfront area. The purpose of the association is to maintain and enhance the quality of life in our neighborhood and our City through information, education, advocacy, self-help, and activism as well as through cooperation with other civic organizations. The organization represents hundreds of residents in the Chelsea Historic Waterfront District who are vehemently opposed to the runway proposal.

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhood. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over our neighborhood. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over heads, a salt pile on another side, an oil tank farm 45 feet from our boundary, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

First and foremost, the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting the Waterfront area. The use of the same model to predict the impact of the dramatic increase in flights over our heads will surely underestimate it as well. We also feel that soundproofing would do little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park and does not help us as we try to enjoy a sea breeze through open windows in the summertime.

We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants - always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact

84.1

84.2

84.3

of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate.

84.4

Naturally we were upset to learn that other alternatives such as a thorough regionalization plan including ALL other options was not included. Additionally, we believe a peak-hour pricing plan analyzing the delay effects of 80, 90, and 100 operations per hour should have been considered because 115 operations per hour understates the true benefit of this alternative. Why wasn't a second airport examined?

84.5

84.6

While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

84.7

84.8

Chelsea is undergoing a modern day renaissance. We have had to fight harder than most to turn the City around. As this proposal is being examined we are watching the value of our homes rise. We have a new school system and a local government committed to undoing the past. We were recently honored as an "All America City," in recognition for our ability to address the problems confronting us. Our budget is balanced for the first time, and we are investing millions in our infrastructure in order to move forward into the next century. The proposed expansion of Logan Airport is the single largest threat we face. If this runway is built, years of hard work could be undone in an instant.

Sincerely,

Jeffrey Buck



President Chelsea Waterfront Association

Code	Topic 1	Topic 2	Comment	Response
84.3	Noise	Sound Insulation	...also feel that soundproofing would do little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park and does not help us as we try to enjoy a sea breeze through open windows in the summertime. We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue.	<p>Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i>. Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including:</p> <ul style="list-style-type: none"> Noise abatement and runway use restrictions; Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation; Encouraging growth at Worcester Regional Airport and other alternative airports; and Monitoring and improving achievement of PRAS goals. <p>The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
84.4	Regional Transportation	Regional Airports	...we were upset to learn that other alternatives such as a thorough regionalization plan including ALL other options was not included.	<p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.</p> <p>Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>
84.5	Alternatives	Peak Period Pricing	...we believe a peak-hour pricing plan analyzing the delay effects of 80, 90, and 100 operations per hour should have been considered....	The Airside Project analysis of PPP examined an operations threshold of 110 operations per hour, which is already below Logan Airport's normal operating capacity of 120 operations per hour. There is no legitimate operational justification for imposing a peak period surcharge at an operation level significantly lower than Logan Airport's normal operating capacity which is achieved 80 percent of the year without any delays. Even at 75 operations per hour, Logan Airport would be subject to delays from northwest wind conditions. The Airside Project analysis in the Draft EIS/EIR and in the Supplemental DEIS/FEIR indicates that, with the Preferred Alternative, Logan Airport can accommodate existing and foreseeable future levels of demand without imposing a drastic administrative restriction to artificially revise Logan Airport's existing capacity.
84.6	Regional Transportation	Regional Airports	Why wasn't a second airport examined?	Comment noted.
84.7	Alternatives	Demand	...this project must be considered and evaluated as stimulating growth in aircraft operations.	The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.
84.8	Ground Transportation	Access to Logan Airport	...the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.	<p>The Airside Project does not result in additional demand for ground access services.</p> <p>Cargo activity at Logan Airport changes from year to year. Despite strong economic growth over the last few years, cargo operations at Logan Airport increased by less than two percent in 1999 and actually declined by 1.2 percent in 1998. Since cargo operations account for only two percent of aircraft activity at Logan Airport and no additional truck traffic is expected to be generated.</p>



COMMUNITY ADVISORY COMMITTEE
TO MASSPORT

18 Greenough Avenue
Boston, Massachusetts 02130

LETTER 85

"We're Stronger Together."

April 7, 1999

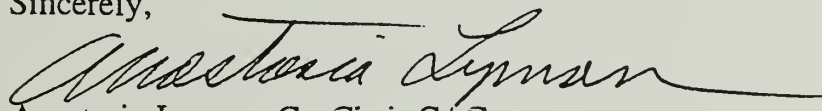
Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Unit
Arthur Pugsley, EOEI No. 10458
1000 Cambridge Street - 20th floor
Boston, MA 02202

Dear Secretary Durand,

As Co-Chair of the Community Advisory Committee to Massport (CAC), I am submitting the following document representing the CAC consultant's opinions on the Massachusetts Port Authority's Draft Environmental Impact Statement on the Logan Airport Airside Improvement Planning Project (DEIS/DEIR).

The CAC concurs with the consultants' conclusion that the DEIS/DEIR should be found inadequate.

Sincerely,


Anastasia Lyman, Co-Chair CAC

Beacon Hill
Braintree
Brookline
Cambridge
Charlestown
Chelsea
Dorchester
East Boston
Everett
Hingham
Hull
Hyde Park
Jamaica Plain
Malden
Medford
Melrose
Milton
Quincy
Revere
Roslindale
Roxbury
Somerville
South End
South Boston
Swampscott
West Roxbury
Winthrop
Woburn

Review Comments
on
Draft Environmental Impact Statement/
Draft Environmental Impact Report
(DEIS/DEIR)
for the
Logan Airside Improvements Planning Project
as presented by
Massachusetts Port Authority
dated
February 1999

Prepared for:
Community Advisory Committee (CAC)

Prepared by:
Consultants to CAC

Consultants include:
Robert G. Burns
Monty Gettys, Montgomery Consulting Group, Inc.
David Standley, P.E.

Prepared on:
March 29, 1999

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Executive Summary

A. Introduction

- ❖ Logan was constructed into a residential setting. Massport for too long has been allowed to take a segmented approach to Logan's development, arguing that landside projects are designed to accommodate ground passenger handling; airside improvement projects are designed to accommodate aircraft handling; that neither generates traffic; and that Massport has no control over passenger and cargo growth. 85.1
- ❖ The Airside Improvement Planning Program is a short-range and limited response to a major concern about long-term trends, future growth, and increasing impact. The prospect is for more and more passengers, more and more aircraft operations, and a greater impact on the surrounding communities. 85.2

B. Addressing the Scope & Regulatory Requirements

B.1 Notice of Project Change

- ❖ The Secretary and FAA should require Massport to change the base year to calendar year 1998, to revise all presentations in the DEIS/DEIR to reflect that change, and to extend the planning period to 2020 from 2010 with concomitant revisions in projected levels of activity and impact, and to republish the DEIS/DEIR.
- ❖ The passage of over five years from the "base year," and the changes in activity levels at Logan since that date, should require that 1998 constitute the "base year" for this Planning Project. 85.3
- ❖ The minimal 15-year planning horizon for the project should be extended to a 20-year planning horizon, to 2020, in order to examine potential impacts and benefits of the project proposals over a reasonable period.
- ❖ The FAA data on delays shows that the delay situation at Logan has improved since 1993 and is essentially in equilibrium, as assessed by the FAA. 85.4
- ❖ The Airside delay model (DELAYSIM) used hourly weather observations from 1981-1990. Weather patterns have changed significantly within the last five years due to effects from El Nino and La Nina. A new 10-year average should be constructed and used. 85.5

B.2 Requirements of ENF Certificate

❖ The items listed below were not specifically addressed in the DEIS/DEIR:

1. Discussion of diversion of cargo to off-airport alternatives 85.6
2. Considering the off-airport alternatives as a separate scenario evaluated during the DEIS/DEIR 85.7
3. Failure to consider Hanscom Field in Bedford as a reliever airport for general aviation operations, origin/destination regional non-jet traffic, and short-haul origin/destination jet traffic. 85.8
4. Considering the development of a second major airport, in discussion of environmental justice 85.9
5. Detailing of the existing delay at Logan including delay derived directly from wind/weather and indirectly from delay at other airports 85.10
6. Documentation of history of PRAS and problems implementing it 85.11

C. Growth & Long-Range Planning Issues

❖ The Secretary of Environmental Affairs should determine that significant planning deficiencies exist in the DEIS/DEIR that must be addressed. The DEIS/DEIR should be found inadequate, and a new Draft document should be required. 85.12

❖ It seems inevitable that Logan Airport will experience growing congestion, and with that congestion will come increasing pressure for additional measures to reduce it. The proposed projects provide only limited and interim relief to whatever aircraft operating delays at Logan Airport are caused by or as a result of the airfield configuration. The delay problem as modeled and represented by Massport will get worse. 85.13

❖ There is no plan or program to deal with long-term growth at Logan, which will soon overwhelm any interim benefits of this project. There are measures that could be instituted to effectively address transportation in eastern New England, but there is no discussion in this document. There must be a plan and a program to shift some current, and most growth in, air traffic and passengers away from Logan. Major expansion of service at and capacity of other airports must be undertaken. 85.14

❖ Massport projects air traffic operations to increase substantially over the project planning period. A conservative projection is a 20% increase in total operations over the next decade. A more important assessment is the projected increase in "equivalent jet operations," which takes into account the substantial increase in noise impact of a nighttime operation compared to a daytime operation. The projected growth in "equivalent jet operations" approaches 50% over the next decade. 85.15

❖ Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations at Logan directly, because of delay reduction.

85.16

❖ This project and landside projects at Logan are interdependent, and both will increase capacity and stimulate demand.

85.17

❖ Massport's proposal to increase the percentage of passengers accessing Logan Airport who do so in high-occupancy vehicles falls far short of absorbing the full projected increase in passenger ground access requirements, even over the limited planning period.

85.18

D. Environmental Issues

D.1 Noise

❖ There can be no guarantee of "unidirectional use" of Runway 14/32.

85.19

❖ We believe airfield operations are unlikely to attain, and even less likely to sustain, the progress toward attainment of PRAS goals that Massport projects. The increasing impact of Logan on the communities in the coming decade stresses the need to reduce dependence on and preference for air travel and Logan in particular.

85.20

❖ PRAS goals were established many years ago, under considerably different circumstances, and may well no longer represent community consensus. The Community Advisory Committee (CAC), however, declined to move for a review and possible modification of the PRAS goals.

85.21

❖ Most of the projected increases in passenger demand will be met by increased operations of the "passenger jet" fleet. This of course is the fleet that creates the noise impacts at Logan and elsewhere.

85.22

❖ There will be significant increases in overflights of East Boston, Chelsea, Everett and other "15/33" communities, and of South Boston, South End, Roxbury and other Runway 27 communities.

85.23

❖ Massport overstates the benefit of further conversion to Stage 3 aircraft on future noise levels around Logan Airport.

85.24

D.2 Night-time Operations

- ❖ The number of nighttime jet operations can be expected to double within the foreseeable future under conservative forecasts. The noise impacts of this increase are huge, and are not mitigated by use of Stage 3 aircraft since night operations are now required to be only of that type.

85.25

- ❖ An alternative that should be considered is the creation of a cap on nighttime operations pursuant to FAR Part 161.

85.26

D.3 Flight Tracks

- ❖ A significant number of flights did not conform to the published departure tracks, and re-crossed the shoreline over Hull and were also below 6,000 feet.

85.27

- ❖ The FAA and the airlines have not adhered to the flight paths established for Runway 27 departures.

D.4 Soundproofing

- ❖ "Soundproofing" is not the answer. Acoustical treatment of selected residences cannot fully mitigate for the impacts of increased overflights and increased ambient noise. We disagree with the statement "After sound-proofing to mitigate impacts within the 65 YDNL Contour, the full-build alternatives provide net long-term benefits."

85.28

- ❖ Concerns about Massport's residential "soundproofing" program include the pace of the program, the failure to provide air conditioning in conjunction with the "soundproofing" program, and the small number of dwelling units that are eligible for the program.

85.29

- ❖ FAA Order 5100.38A makes ineligible for AIP funding any non-related code-required building improvements necessary to accommodate acoustic treatment improvements. This may impose significant burdens on some property owners.

85.30

D.5 Air Quality

- ❖ The proposed Airside Improvement Project provides minimal long-term air quality benefits. Changes in air quality associated with the proposed project are likely to be undetectable, with the exception of adverse odor impacts.

85.31

- ❖ There is potential for adverse odor impacts in certain areas proximate to the airport, as a result of this project. Changes in odor impacts are most likely to occur in the Jefferies Point neighborhood from takeoffs on Runway 14. 85.31
(cont.)
- ❖ The odor modeling and odor impact assessment procedure is inadequate. 85.32
- D.6 Dispersion Modeling Results**
- ❖ For all modeled contaminants other than VOCs, the difference (if any) among Airside Improvement Project alternatives is much less significant than the projected growth of emissions over time. 85.33
- ❖ Massport should have used the ten-year hourly average meteorological input for the air quality dispersion model, and should be required to rerun the dispersion model for all of the conditions modeled for the DEIS/DEIR. 85.34
- D.7 Endangered Species - Upland Sandpiper**
- ❖ A program is required to compensate for impacts to the nesting habitat on Logan Airport of the state-listed endangered upland sandpiper. The suggested program appears highly speculative as described. Massport should be required to set forth the resolution with NHESP in the DEIS/DEIR. 85.35
- D.8 Construction Impacts**
- ❖ Massport has failed to demonstrate how fugitive dust emissions from construction operations on the airfield will be controlled during winter months. 85.36
- ❖ Shortcomings of the Massport construction noise analysis include its failure to address the matter of pure tones and of impact noise (*i.e.*, paving breakers and hoe rams), and the failure to separate out and separately analyze nighttime construction noise levels against nighttime ambient levels. The noise criteria applied by Massachusetts Department of Environmental Protection are applicable to this project. 85.37
- D.9 Cumulative Impacts**
- ❖ We disagree with the statement "After sound-proofing to mitigate impacts within the 65 YDNL Contour, the full-build alternatives provide net long-term benefits." 85.38
- ❖ Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations at Logan. 85.39

D.10 Relationship to the GEIR

- ❖ The planning period is inadequate, and should be extended to 2020. There is no plan or program to deal with long-term growth at Logan, which will soon overwhelm any interim benefits of this project. 85.40
- ❖ Delay does not appear to be a major problem at Logan, based on Massport's two-year history of inaction and on FAA analyses. 85.41
- ❖ The Secretary of Environmental Affairs should determine that significant planning deficiencies exist in the DEIS/DEIR that must be addressed. The DEIS/DEIR should be found inadequate, and a new Draft document should be required. 85.42

D.11 Relationship to Other Logan Projects

- ❖ This airside project and the landside projects at Logan are interdependent, and both will increase capacity and stimulate demand. 85.43

E. Delay

- ❖ There is no discussion in the DEIS/DEIR on the selection of the model for estimating delay. The models used including FLAPS and DELAYSIM appear to have been developed exclusively for analysis of Logan. Background information on the development of these models is not presented, as required by FAA. 85.44
- ❖ Massport did not use the FAA-approved SIMMOD model for the airport simulations, but chose to develop its own model for estimating delay. 85.45
- ❖ The delay hours projected by Massport are the artifacts of its own model, severely overstate the actual situation, and do not comport with the FAA's procedure for calculating delay at airports. Besides calculating every minute of potential delay associated with every scheduled flight, it fails to take into account normal flight cancellation activities by airlines. 85.46
- ❖ The DELAYSIM model should use as the leading criteria the highest capacity configuration and air traffic controller workload weighting approved by FAA ATC. This approach would be a more conservative approach and reflect historical operational selections by the FAA ATC personnel, instead of assuming attainment of PRAS goals can and will be an initial decision point. No data is presented to show recent improvement due to the availability of Enhanced PRAS (EPRAS). 85.47

- ❖ The report compares Massport's calculation of delay with FAA's calculation of delay. This comparison throughout the DEIS/DEIR is incorrect and misleading. 85.48
- ❖ The FAA data on delays cited elsewhere in this report shows that the delay situation at Logan has improved since 1993 and is essentially in equilibrium, as assessed by the FAA. From 1993-1997, delay at Logan as calculated by FAA, has decreased almost 36%. FAA reported delay for 1998 was 18% lower than 1993 levels. The DEIS/DEIR does not reflect this information. This reduction in delay has occurred without the implementation of any of the airside improvements proposed in this DEIS/DEIR. 85.49
- ❖ Modeled delay under the most optimistic Massport scenario will return to present levels within a very few years and increase after that. The stimulation of demand is not reflected in the annual hours of delay calculations. 85.50
- ❖ While peak hour capacity does not increase with construction of the runway, the additional runway will provide the controllers the option to use higher-capacity configuration more of the time. This ability is providing additional "throughput" of aircraft operations. 85.51
- ❖ The guise of constructing the new runway to reduce weather-related delays actually has the effect of increasing the all-weather capacity of the airport; thus allowing for additional throughput of aircraft operations.

F. Alternatives

- ❖ Massport has not met the requirements of the National Environmental Policy Act (40 CFR Part 1502 Environmental Impact Statements) that requires the DEIS/DEIR to "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." No discussion of "alternatives not considered in this DEIS/DEIR" was included. A reasonable person could expect the DEIS/DEIR alternatives to include the following: 85.52
 - a. Development of a new airport 85.53
 - b. Consideration of Implementing a High-Density Rule (Slots) 85.54
 - c. Consider Implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions for Stage 2 and Stage 3 operations at Logan to provide noise relief to affected communities. A specific measure that could be considered is a cap on night-time operations. 85.55

F.1 Regional Airports

- ❖ The New England governors, the FAA, and the Federal Highway Administration must assist state government and the Boston Area communities in devising and implementing programs to ensure that Massport's numbers grow no larger, while not inhibiting normal beneficial economic growth of Eastern New England. The Airside Improvement Project must be viewed in this larger regional context. 85.56
- ❖ Massport argues that the growth in passenger traffic experienced at the Manchester, New Hampshire Airport and the T. F. Green Airport in Warwick, Rhode Island represents shifts of demand from Logan Airport. It is equally likely that the introduction to those two airports of low-cost carriers has stimulated overall regional air travel growth, the bulk of which has been absorbed at those two airports. 85.57
- ❖ If market forces are left to drive growth in traffic at those airports, growth at Logan will not be significantly constrained. Specific goals would have to be established, and a series of measures implemented to stimulate a substantial shift of traffic demand from Logan. 85.58
- ❖ The ENF Certificate dated November 22, 1995 cited that "the alternatives analysis must be broadened to include off-airport alternatives." Although Massport includes some off-airport options, the development of other obvious alternatives has not been reasonably discussed nor have the reasons for their elimination as options. 85.59
- ❖ The conclusion of the MAC Second Major Airport Study points out that long term considerations to meet increasing demand require that a second airport (either a greenfield airport and/or significant expansion of an existing airport) be an alternative to the improvements recommended. 85.60

F.2 Peak Hour Pricing

- ❖ Congestion pricing, peak-period pricing and techniques that base landing fees on functional categories relating to operations (landing or take-offs, weight (or size) of aircraft, and capacity to meet peak period demand could be particularly useful in reducing delays. Peak Period Pricing is but one form of economic incentive or control that should be considered in evaluating measures to reduce airspace and airfield congestion. 85.61
- ❖ The basic assumption was made that peak period pricing needed to be revenue neutral, pertaining only to airfield revenue and airfield costs at Logan. This assumption resulted in impacts to airlines that operate small aircraft only. 85.62

- ❖ Consideration should be given to a quite different approach to addressing the efficiency of Logan Airport during peak operating periods and in carrying out its primary mission. 85.63
- ❖ Massport's model for peak hour pricing has chosen too narrow a definition of the regulatory criteria it must meet to establish a peak hour pricing structure. 85.64
- ❖ Massport chose a higher operational threshold (115 operations per hour) which underestimates the delay reduction capabilities of peak hour pricing. The range of options considered for Peak Period Pricing is insufficient. It is essential to introduce other economic factors into the decision process of the airlines, large and small. 85.65
- ❖ The option of utilizing "costing" (including peak period pricing) approaches for the purpose of delay reduction should be retained. It should be the first option selected for implementation, as a non-capital intensive, adjustable measure to move toward a goal. 85.66

F.3 Other Alternatives

- ❖ A shift away from air travel through reliance on other means of travel or communication is essential. Vigorous measures to foster and encourage this shift should be undertaken by State government in cooperation with Amtrak and telecommunications providers. 85.67

G. Benefit-Cost Analysis

- ❖ FAA legislation requires that airport sponsors conduct a benefit-cost analysis for capacity-related airport projects, particularly when the sponsor anticipates the need for \$5 million or more in Airport Improvement Program grants. The DEIS/DEIR does not indicate the requirement of a benefit-cost analysis. 85.68
- ❖ There are no economic analyses of the noise impacts regarding the various alternatives. The noise-related costs and benefits should be addressed in economic analyses of activities that result in increases or decreases in aircraft noise. 85.69
- ❖ The development of the preferred alternative is anticipated to cost over \$60 million. No indication of how the project is to be financed is provided in the DEIS/DEIR document. This information should be discussed as it may be relevant to the selection of alternatives. 85.70

H. Airfield Layout & Utilization

H.1 Runway 14/32

- ❖ Layout Option C for Runway 14/32 requires the FAA to issue a "Modification of Standards."
- ❖ Should the FAA decline the Modification of Standards, the possibility of constructing the runway, and/or the environmental impacts of constructing the runway, may change. If the runway cannot be so shifted, Option A or reducing the runway length would be the only viable options. Option A has a significant impact on Hyatt parking, as it would require a substantial reduction in that parking for which there appears to be no alternative. These eventualities are not thoroughly explored in the DEIS/DEIR. 85.71
- ❖ The commitment to maintain Runway 14/32 as a unidirectional runway is clearly reversible. 85.72
- ❖ Massport indicates that only regional and commuter aircraft will use the proposed runway. The Airport Reference Code (C-III) for the proposed runway includes the following aircraft types: Airbus A-320s, BAC 111s, Boeing 727s, Boeing 737s, Fokker F-28s, and MDC DC-9s. Therefore, large jets can and will use the runway. 85.73

H.2 Centerfield Taxiway

- ❖ The summary of advantages cited for the Centerfield Taxiway supports the community concern that the presence of the Centerfield Taxiway will make the use of the 4/22 runway combinations more attractive and therefore will tend to strengthen the bias of the tower toward use of those runways. Not only would this operate contrary to the goal of shifting operations from those runways, it would increase the tendency to stack aircraft in the northern section of the airfield. 85.74

I. Preferred Alternative

- ❖ Massport is not including Alternate 1 as the preferred alternative which according to its model provides the highest reduction in delay. Peak hour pricing is said to be not included because of current conditions but is represented as an administrative option that can be implemented later. However, Massport makes no commitment to ever using this capacity management tool. The rejection of peak period pricing by Massport is inappropriate, and ignores several salient factors. The peak period pricing option or an alternative congestion approach should be implemented immediately to gain its delay-reduction benefits throughout and beyond any construction period. 85.75
85.76

- ❖ Layout Option C for Runway 14/32 requires the FAA to issue a "Modification of Standards." Should the FAA decline to do that, the possibility of constructing the runway, and/or the environmental impacts of constructing the runway, may change. These eventualities are not thoroughly explored in the DEIS/DEIR.
- ❖ There are adverse air quality impacts associated with construction of Runway 14/32 and the Centerfield Taxiway that are not sufficiently explored in the DEIS/DEIR. These include odor impacts especially in the Jefferies Point area, and potential construction dust problems. 85.77
- ❖ A major element of the proposal to mitigate impacts on the state-listed upland sandpiper, that of creation of a replacement habitat on Cape Cod, appears to ignore geography and is of questionable benefit. 85.78
- ❖ The commitment to maintain Runway 14/32 as a unidirectional runway is clearly reversible. That, and the signal this project sends that Massport continues to be committed to expansion of Logan Airport, are the two greatest concerns of the surrounding communities. 85.79
85.80
- ❖ Alternate No. 3 provides delay reduction without the build option. Alternate No. 2 provides significant delay reduction by allowing maximization of existing airfield capacity through the construction of a parallel taxiway. These two alternatives appear to be the most viable for the community. 85.81

Review Comments
on Logan Airside Improvement Planning Project

A. Introduction

The need to accommodate the demand for air travel services to Boston and the region has continually conflicted with the residential concerns regarding noise, air quality, property value and quality of life issues. This conflict between Massport and the communities has been on-going for over four decades. While the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) identifies the economic necessity of operations at Logan, it minimizes the fact that neighboring communities were well established prior to the development of Logan International Airport. The timeline of Logan's development, if documented, would place a responsibility on Massport to more closely consider how development of its property affects its neighbors. If Massport is taking responsibility for providing adequate air service to meet the region's growing needs and economy; then the DEIS/DEIR document should indicate a) what the long term (20 year) needs are, and b) how the alternatives considered meet these needs.

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Logan Airport was developed in 1923, significantly after most development of residential communities surrounding the Airport property. Unlike many airports that are initially developed without encroachment of residential uses, Logan was constructed into a residential setting. The history of the airfield at Logan is noted in Appendix B but does not point out the residential development existing during the phases of development.

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Massport for too long has been allowed to take a segmented approach, arguing that landside projects are designed to accommodate ground passenger handling; airside improvement projects are designed to accommodate aircraft handling; that neither generates traffic; and that Massport has no control over passenger and cargo growth.

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There needs to be a reallocation of roles and responsibilities, a primary objective of which should be to significantly temper the adverse impacts of air and ground vehicle operations to and from Logan Airport.

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B. Addressing the Scope & Regulatory Requirements

B.1 Notice of Project Change (Massport letter dated February 16, 1999 to the Secretary of Environmental Affairs on transmission of DEIS/DEIR document)

It is now unlikely that the notice of availability of the Final EIS/EIR for the project will be published prior to the summer of 1999, nearly four years after the publication of the ENF. This project, initiated in 1995 with the filing of an ENF, uses 1993 as its "base year" for planning purposes and for comparison of impacts and benefits from

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the proposed project. The passage of over five years from the "base year," and the changes in activity levels at Logan since that date, warrants and should require that 1998 and data therefrom constitute the "base year" for this Planning Project. A full year of records of activity levels, including flight activity, passenger levels, fleet mix, and delays, is now available from that year and should be used instead of the 1993 data.

The planning process to date has used a 15-year planning horizon, to 2010 from the 1995 date of filing of the ENF. 2010 is now only 11 years away and the minimal 15-year planning horizon for the project should be extended to a 20-year planning horizon, to 2020, in order to examine potential impacts and benefits of the project proposals over a reasonable period.

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For these reasons, the Secretary and FAA should find the lapse of time significant, should consult with the Community Advisory Committee and others, and should receive comments on the Notice, as provided for in 310 CMR 11.10(8). The Secretary and FAA are urged to require the proponent, Massport, to change the base year for planning for the project to calendar year 1998, to revise all presentations in the DEIS/DEIR including the appendices thereto to reflect that change, and to extend the planning period to 2020 from 2010 with concomitant revisions in projected levels of activity and impact, and to republish the DEIS/DEIR.

Massport claims that there has been no change in schedule (i.e., item c on page 3 in letter dated 02/26/99) for the project since no preferred alternative was identified or selected. Further, it claims that no change in completion or work schedule dates for the Project has occurred. This is untrue. Massport choose to delay the submittal of the DEIS/DEIR documents; thus, there have been changes to the schedules discussed at the ARC meetings.

According to 40 CFR Part 1502 Environmental Impact Statements¹ (PP1050.1) "An agency shall commence preparation of an environmental impact statement as close as possible to the time the agency is developing or is presented with a proposal (PP1508.23) so that preparation can be completed in time for the final statement to be included in any recommendation or report on the proposal. The statement shall be prepared early enough so that it can serve practically as an important contribution to the decisionmaking process and will not be used to rationalize or justify decisions already made." PP 1508.23 describes a proposal as the following: " 'Proposal' exists at the stage in the development of an action when an agency subject to the Act has a goal, is actively preparing to make a decision on one or more alternative means of accomplishing that goal, and the effect can be meaningfully evaluated." The ENF Certificate was issued November 22, 1995. Massport and the FAA have not complied

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¹ Council on Environmental Quality, 40 CFR Part 1502.5

with the required timing of the DEIS/DEIR document. Furthermore, the analysis uses baseline data of 1993 for a document submitted in 1999.

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The FAA data on delays cited elsewhere in this report shows that the delay situation at Logan has improved since 1993 and is essentially in equilibrium, as assessed by the FAA. Massport has clearly demonstrated, by its action placing this project on hold for nearly two years, that the problem is not "a matter of priority." It now proposes to stretch out construction over a five-year period. Once planning, environmental review, and design were completed, one could build a new airport in five years!

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B.2 Requirements of the ENF Certificate (issued November 22, 1995)

The ENF Certificate required consideration of several additional issues that were not specifically addressed in the DEIS/DEIR document, including:

1. Page 3 of ENF Certificate - Discussion of diversion of cargo to off-airport alternatives 85.93
2. Page 3 of ENF Certificate - Considering the off-airport alternatives as a separate scenario evaluated during the DEIS/DEIR 85.94
3. Page 4 of ENF Certificate - Considering the development of a second major airport in discussion of environmental justice 85.95
4. Page 5 of ENF Certificate - Detailing of the existing delay at Logan including delay derived directly from wind/weather and indirectly from delay at other airports 85.96
5. Page 6 of ENF Certificate - Documentation of history of PRAS and problems implementing it 85.97

B.3 Cumulative Impacts

Massport argues that Federal policy limits the need to address cumulative impacts of the current proposals. This DEIR is submitted subject to Massachusetts laws, policies and regulations, in addition to federal regulations and guidance (page 7-3). As such, it is subject to the determination of the Secretary of Environmental Affairs as to whether cumulative impacts have been adequately addressed.

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C. Growth & Long-Range Planning Issues

The Airside Improvement Planning Program is a short-range and limited response to a major concern about long-term trends, future growth, and increasing impact. Logan Airport is not going to go away. The prospect is for more and more passengers, more and more aircraft operations, and a greater impact on the surrounding communities. The DEIS/DEIR does not address the long term implication of growth.

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C.1 Stimulation of Growth

Federal planning policy² establishes that this project must be considered and evaluated as stimulating growth in aircraft operations at Logan directly, because of delay reduction. The DEIS/DEIR makes a clearly contrary statement. In our opinion, the statement (page 7-3) that "The Airside Project has independent utility, and will not stimulate, preclude, or otherwise determine other development anticipated as part of Massport's landside planning effort" is incorrect.

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Massport argues the Airside Improvement Project is independent of the landside projects in every way. We disagree. Both landside and airside projects clearly enhance the attractiveness of Logan Airport, the efficiency of managing ground and air traffic, and the capacity to handle such traffic and passengers. Of course, a more attractive Logan Airport will attract more discretionary travel, divert travel from other modes, and recapture travel from other airports.

The full implementation of the Airside Improvement Project, as proposed by Massport in its preferred alternative, would provide a runway configuration with an operational capacity equal or nearly equal to that provided by the current maximum capacity runway configuration at Logan Airport, the 4/22 runways in combination with Runway 9/27. This will significantly increase the average capacity of the airfield. It will significantly extend the time and meteorological conditions under which the highest operational capacities are available at Logan. This will temporarily reduce delay, as Massport has argued. Therefore, it should be expected that the near-term result would be to reduce the rate of "capture" of Logan passengers by other airports and by other transportation modes. This, in turn, will place greater burdens on all elements of all systems at or serving Logan. This is expansion of capacity. Such an increase must be translated into a projected increase in demand, as the FAA has stated in its regulations.

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² FAA-APO-98-4 "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", B "Capacity Increases which Reduce Congestion Related Delay"

C.2 Forecast Planning Period

This DEIS/DEIR, like the GEIR and Annual Updates, does not cover a sufficient planning period. Massport continues the fiction that 1999 is the near future and 2010 the far future (DEIS/DEIR page 7-5). For a \$60 million project, and for Logan Airport, 2010 is the near future, beyond 2020 is the far future.

This section labels 1999 as "near term" and 2010 "long term." In terms of forecasting, Massport has provided an inadequate length of forecast years for evaluation of the long term impacts on the airside improvements proposed. Prudent planning would dictate that Massport look further than 10 years in the future in this document. Implementation of the proposed airside improvements is planned over a 5-year construction period beginning in 2000 (assuming permitting is completed). Thus, by the time all of the projects would be constructed (September 2004), the forecasts are only applicable for six years under the current timeperiods. The forecasts presented in the DEIS/DEIR are not appropriate for: a) determining the long term evaluation of the impacts planned, b) selection of base year data, c) timeframe for implementation of the project.

As a standard, FAA typically reviews and evaluates 20 year forecasts. Per FAA Advisory Circular 150/5070-6A entitled "Airport Master Plans," the following is noted: "The length of the short, intermediate and long-term activity forecasts should be decided, while 5-10-20 year times are typical, there may be justification for using different time frames." Massport has provided forecasts for current year (1999) and ten year (2010) periods. No justification for using these shorter time frames was given.

C.3 Base Year Assumptions

The base year for the development of these forecasts is 1993, five (5) years prior to the submittal of the DEIS/DEIR document. A more updated forecast for passengers at Logan in future 5, 10, and 20 years with high and low fleet scenarios should be provided for evaluation.

The Base Year and 29M High-Range Fleet data used for development was based on conditions through 1993, a full five years prior to the submittal of the DEIS/DEIR document. Massport cites significant changes since 1993 in the aircraft fleet mix; thus the validity of the base year and high-range fleet forecasts are not appropriate for consideration in this analysis because of: a) age of background material and b) changes in fleet mix occurring during short term period (1993-1998). In fact, Massport prepared alternate fleet forecast called the 29M Low-Range Fleet data.

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C.4 Forecasts

Forecasting the total number of annual passengers is the first step in the methodology for the 29M High and Low Fleet Assumptions (Appendix E, Section 3, page 3) and the Logan 2010 Fleet Forecast (Appendix E, page 17). Since specific information was not presented for the development of the passenger forecasts that is the input for the fleet forecast, the fleet forecast output is invalid.

Additionally, although the methodologies for the 29M, 37.5M and 45M were explained in Appendix E, the forecasting methodologies are not consistent with each other. The Base Year and 29M High Forecast were developed under one method, the 29M Low Forecast made specific adjustments based on changes in the fleet activity at Logan and the 37.5M and 45M scenarios were developed using a different methodology (and were performed in 1995).

Since the airside improvements are to cost over \$60 million to construct and since there is significant concern from the communities regarding the long term demand and development at Logan, Massport should provide recent and relevant passenger forecasts for a 20 year period with associated operational forecasts using high and low fleet scenario assumptions that are consistent for all forecast years. This information is the backbone of the environmental impact report and affects all of the analysis of the alternatives.

It is important to note that the DEIS/DEIR document footnotes that Massport's planning forecasts will be formally reviewed in the next GEIR. This footnote says that the forecasts, which the evaluation of these airside improvements was based on, is going to be changed in 1999. Massport delayed submittal of the DEIS/DEIR document for over two years; now, it is submitting forecast information that they indicate will be updated this year.

The DEIS/DEIR does not indicate the detailed methodology used to develop the levels of passenger forecasts presented. Per 40 CFR Part 1502 Environmental Impact Statements regarding methodology and scientific accuracy ". . . They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for the conclusions in the statement."³

Massport is now saying that the potential diversion to regional airports is "accounted for in the range of passenger levels analyzed." These passenger levels, ranging from 37.5 to 45 million annual passengers and originally projected for the year 2010, were derived from standard demographic projections based on a number of factors not including the potential diversion to regional airports. (See, i.e., the 1994/5 GEIR)

³ Council on Environmental Quality, 40 CFR Part 1502.24

It should follow that as passenger levels rise and congestion increases, the attractiveness of regional airports, and therefore the extent of diversion of passenger traffic, should increase. Thus, the diversion amount on an annual basis should be higher at a 45 million annual passenger load than at 37.5 million.

Massport also suggests that the past parallel between passenger growth and increase in flight operations will change. In the past, the growth curve of flight operations has essentially mirrored the growth curve in passengers, on an annual basis. Massport now projects that in the future, average aircraft capacity will increase, and average load factors will also increase, thereby reducing the rate of growth of operations compared to the rate of growth of passengers. Recent experience, through 1998, does not bear out this projection. The 1998 data indicates the distribution of jet passenger operations by aircraft size category has changed little since 1993.

Massport must clearly identify the basis for the passenger demand projections, and must state the confidence level in those projections. Similarly, it must state the confidence level in the projections of diversion at each projected passenger level, and show the resultant range of passenger level projections.

Massport argues that the growth in passenger traffic experienced at the Manchester, New Hampshire Airport and the T. F. Green Airport in Warwick, Rhode Island represents shifts of demand from Logan Airport. It is equally likely that the introduction to those two airports of low-cost carriers has stimulated overall regional air travel growth, the bulk of which has been absorbed at those two airports.

The distinction between the "low operations fleet" and the "high operations fleet" is confused in the DEIS/DEIR. Table 4.2-6, 1999 Aircraft Operations Forecasts, is consistent with the text description under Section 4.2.2. In this table, under the "high fleet" forecast, the distribution of passengers shifts slightly to the regional carrier fleet. The passenger jet operations decrease slightly, the regional carrier operations and total operations increase significantly. However, in the 2010 Aircraft Operations Forecasts (Table 4.2-7) the passenger jet operations increased markedly over the 1999 forecasts, with the increase ranging from a low of 11% comparing the "low fleet" forecasts, to 23% to 35% for the "high fleet" forecasts. But the regional carrier operations remain within the general range projected for 1999, 200,000 to 250,000 operations per year. In the "2010" "high fleet" forecasts, the regional carrier operations are shown as 42% of the carrier fleet operations, rather than the 50% stated as an assumption in Section 3.1.2, page 1-11.

This and the percentage distribution of passengers between "passenger jets" and "regional carriers" presented in those tables indicate that most of the projected increases in passenger demand will be met by increased operations of the "passenger jet" fleet. This is the fleet that creates the noise impacts at Logan and elsewhere.

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Table 1 as follows shows historic activity levels at Logan. Table 2 (based on Table 11 in Appendix E of the DEIS/DEIR) presents Massport's projected changes in the jet passenger fleet mixes for the forecast years.

It should also be noted that cargo fleet operations in 1999 (Table 4.2-6) were held constant in both the "low fleet" and the "high fleet" projections, at 13,000 operations. For 2010 (Table 4.2-7) the cargo fleet (jet) "low fleet" forecast operations are not increased from the 1999 forecasts, and are increased to 18,000 operations per year for the high fleet forecasts. If the projections were consistent, the 2010 low fleet forecast would use 18,000 cargo operations and a total of 325,000 jet operations per year. Furthermore, the increased economic growth projection that results in the 45 million passenger forecast in 2010 should also include a concomitant increase in the cargo jet operations forecast to 22,000 operations per year and a total jet operations of 382,000 per year. These corrections will affect the noise and noise impact forecasts of Chapter 5 and Appendix L.

In our opinion, Massport should be carrying its projections a minimum of 20 years from a base year of 1998, for a draft environmental impact statement and report published in 1999. We strongly recommend the year 2020 as the planning period for this project, consistent with Federal planning recommendations.

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TABLE 1
Massport Logan Activity Levels, 1990-1998

YEAR	PASSENGERS		OPERATIONS					
	TOTAL		JET	% JET	NON-JET	%NON-JET	GA	%GA
1990	22.9 million	425,000	249,000	59%	\$ 151,000	36%	\$ 25,000	6%
1991	21.5 million	430,000	233,000	54%	\$ 174,000	40%	\$ 24,000	6%
1992	22.7 million	474,000	244,000	51%	\$ 205,000	43%	\$ 26,000	5%
1993	23.6 million	493,000	246,000	50%	\$ 244,000	49%	\$ 23,000	5%
1994	24.5 million	459,000	251,000	55%	\$ 183,000	40%	\$ 24,000	5%
1995	24.2 million	466,000	241,000	52%	\$ 201,000	43%	\$ 24,000	5%
1996	25.1 million	456,000	241,000	53%	\$ 189,000	41%	\$ 26,000	6%
1997	25.6 million	483,000	255,000	53%	\$ 198,000	41%	\$ 30,000	6%
1998 (partial)	22.5 million	425,000	233,000	55%	\$ 166,000	39%	\$ 26,000	6%

Note: This table demonstrates the constancy of the relationship between jet carrier aircraft operation and regional non-jet operations at Logan over the period 1991-1997. Absent significant changes in markets or types of travel demand, the basis for Massport's assumption of changes in this relationship is not apparent.

TABLE 2

PASSENGER JET OPERATIONS AT LOGAN AIRPORT

YEAR/Pass Level FLEET MIX	1953 24 Mil High	1956 28 Mil	1957 28 Mil	29 Million Low Fleet	29 Million High Fleet	37.5 Million Low Fleet	37.5 Million High Fleet	45 Million Low Fleet	45 Million High Fleet
Aircraft capacity (passg)	#	#	#	#	#	#	#	#	#
<80	3,329	1%	15,370	6%	2,931	1%	24,215	5%	27,514
91-120	44,574	18%	42,368	15%	49,814	16%	35,157	17%	59,548
121-175	132,415	53%	136,216	50%	128,226	48%	119,253	47%	123,008
176-225	34,449	14%	58,703	21%	61,918	22%	89,661	18%	86,839
>225	27,049	11%	22,156	8%	24,461	9%	57,363	14%	78,102
TOTAL	241,018	100%	274,811	100%	267,148	100%	305,649	100%	338,279

Comments: It is counterintuitive that the total passenger jet operations should be the same for the 37.5 million annual passenger and 45 million passenger High Fleets. For the same two passenger levels, 37.5 and 45 million, the Low Fleet Mix for the respective years increases by about 32,000 operations (+10.7%).

Comparing the 1953 "high fleet" mix operations to the 29 million passenger High Fleet operations yields a similar 10.3% increase in operations

YEAR/Pass Level FLEET MIX	29 Million Low Fleet	37.5 Million Low Fleet	45 Million Low Fleet	29 Million High Fleet	37.5 Million High Fleet	45 Million High Fleet
Aircraft capacity (passg)	#	#	#	#	#	#
<80	15,370	24,215	27,514	2,931	19,045	24,815
91-120	42,368	35,157	19,828	49,814	59,548	33,764
121-175	136,216	119,253	123,008	128,226	168,260	148,161
176-225	58,703	89,661	89,829	61,918	62,945	92,890
>225	22,156	57,363	78,102	24,461	48,943	61,233
TOTAL	274,811	305,649	338,279	267,148	358,739	359,762

Comment: The projected distribution of operations among jet aircraft size categories is compared separately for the "low fleet mix" and "high fleet mix" for each of the three projected annual passenger volumes. For the "low fleet" forecast, Massport assumed a significant shift, both in numbers of operations and in percentage of total operations, to larger aircraft as passenger volumes increase, except that both operations and percentage of the smallest jets are also forecast to increase. For the "high fleet" forecasts, Massport's projected trends are less clear. (There appears to be a significant error in the forecast number of operations of the smallest passenger jets in the 29 million passenger "high fleet" forecast. Even accounting for that error, operations in that category are projected to increase as passenger volume increases. For the 37.5 million annual passenger "high fleet" forecast, operations of all aircraft size categories are projected to grow in number, although percentage of operations decreases in all but the smallest and largest size categories. (The growth in number of operations in the size category 176-225 passenger capacity is essentially nil.) However, the projection for the 45 million annual passenger "high fleet" scenario is quite different. Numerical growth in operations is forecast for the smallest and the two largest size categories, which also increase percentage share of operations significantly. The number of operations in the two remaining size categories, 91-120 and 121-175 passenger capacity aircraft, decreases dramatically both numerically and as a percentage of total operations.

C.5 Regional Context of Logan Airport and the Regional Transportation Policy

Logan Airport is recognized as a major facility, and its operations a major activity of the regional transportation complex. An issue that we believe is precipitated by the Airside Improvement Planning Process is the future role of Logan Airport in regional transportation. The affected communities universally believe that the impacts of air and ground traffic associated with Logan Airport have for many years created intolerable and unacceptable noise and traffic impacts, and make significant contributions to unacceptable air quality levels. Massport argues that airlines serving Logan and airline passengers currently encounter excessive and unacceptable levels of delay. So, what is to be done?

Massport projects air traffic operations to increase substantially over the project planning period. A conservative projection is a 20% increase in total operations over the next decade. A more important assessment is the projected increase in "equivalent jet operations," which takes into account the substantial increase in noise impact of a nighttime operation compared to a daytime operation. The projected growth in "equivalent jet operations" approaches 50% over the next decade.

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Massport proposes to increase the percentage of passengers accessing Logan Airport who do so in high-occupancy vehicles, but its proposal falls far short of absorbing the full projected increase in passenger ground access requirements, even over the limited planning period.

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C.6 New Large Aircraft

A new class of much larger aircraft is under active development by several manufacturers. These aircraft are referred to as "New Large Aircraft" (NLAs)⁴, and are projected to have passenger capacities ranging upwards to nearly 1,000 (!), to weigh in excess of one million pounds (Maximum Take Off Weight), to utilize engines with total aircraft thrust ranging upward to around 350,000 pounds of thrust, to have wingspans of as much as 260 feet and to be as long as 300 feet, and to have main wheel assemblies as wide as 50 feet. Representatives of this class include the Airbus A3XX, and the Boeing 747-500 and -600.

The FAA will categorize them as a completely new "group" of aircraft, Group VI. (The B 747-400 is in Group V.) Another type of aircraft, the High-Speed Civil Transport (HCST) would also be included in this Group VI. These are supersonic aircraft, with a significantly longer development horizon. The range of these planes is expected to exceed 7500-8000 miles, and their projected utilization is for

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⁴ FAA Report DOT/FAA/AR-97/26, "Impact of New Large Aircraft on Airport Design," March 1998. This report is available on the Internet at www.tc.faa.gov/its/worldpac/techrpt/ar97-26.pdf.)

international heavily traveled routes. The manufacturers are currently projecting introduction of these planes into the international fleets in the period 2003-2006.

Current information indicates a host of serious issues associated with the introduction of this class of aircraft. Their size, weight, turning radii during taxiing, wingspans and wingtip clearance requirements will require substantial adjustments of many kinds to airfields. Their size and height, and the number of passengers, pose significant terminal problems. They are expected to require runways of about 11,000 feet in length. Many existing airfields will not find it feasible to accommodate these aircraft, or will require extensive waivers of FAA requirements and significant operating restrictions even for very limited numbers of NLA operations. Others will require very large investments, substantially over \$100 million in the case of Kennedy Airport, to accommodate these planes.

With their enormous size and great thrust, wake turbulence will be a problem, and jet blast and intake problems would have to be dealt with. Basically, these planes will need a lot of space both in the air and on the ground. These considerations will in turn create delay problems.

We doubt that Logan can accomplish the modifications necessary to accommodate these planes. This therefore becomes another argument for the development of a major international airport serving New England that will have the capacity and capability to handle this generation of planes.

C.7 Community Impacts

These documents fail to address how Massport, the air transportation system, and the regional transportation and communication systems will cope with continued passenger and operations growth while simultaneously maintaining and improving environmental quality and quality of life, and an efficient transportation and communication system in the future. The proposed projects provide only limited and interim relief to whatever aircraft operating delays at Logan Airport are caused by or as a result of the airfield configuration. The delay problem as modeled and represented by Massport will get worse.

How much worse, and how soon, will be determined by decisions of passengers and airlines. What will Massport do then? Work with the FAA to find ways of cramming more operations into daytime hours? That would certainly increase community impacts. Propose some further reconfiguration or expansion of the airfield? That is not possible without enormous environmental and community impacts, and huge costs. Work with the air transportation industry and the operators of other airports to create viable, attractive, competitive, full-service alternatives to using Logan? Massport suggests this option has a limited capability to relieve congestion at Logan,

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and further suggests that Logan will always be the more attractive option. This attitude, and those facts, if they are facts, must be changed. Or, does the resolution lie in the establishment of a new, major regional airport?

Massport argues that the project "will not result in the division or disruption of established communities." This must refer solely to physical division or disruption, since Massport's promotional and political strategy has clearly been to effect division among the communities around Logan Airport. Some of these communities will be further disrupted by the short-term shifts in runway usage which are the basis for Massport's claims of "net benefits", all will be disrupted by further growth in Logan air operations over the near and far futures. Furthermore, this is the last possible physical project to increase Logan airfield capacity that could be undertaken without "division or disruption of established communities," or of the waters of and lands under Boston Harbor.

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Aircraft operations and the impact of those operations at Logan and to Logan neighbors will continue to increase as long as Massport and the FAA, or other state and federal agencies, do not exercise control over airline practices and policies. It will have taken over 20 years to fully convert the jet fleet to Stage 3 aircraft, and there is no program envisioned to create a future class of substantially quieter transport aircraft. The noise impact per operation is unlikely to diminish significantly in the next 30 to 40 years.

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Both economic growth and the highly competitive nature of the air travel business increase passenger demand for both business and pleasure travel. As long as this demand is not channeled to other means of transportation and communication, and to other airports, passenger demand at Logan will grow. This growth will in turn spur growth in aircraft operations.

It seems inevitable that Logan Airport will experience growing congestion, and with that congestion, will come increasing pressure for additional measures to reduce it.

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The Secretary of Environmental Affairs should determine that significant planning deficiencies exist in the DEIS/DEIR that must be addressed. The DEIS/DEIR should be found inadequate, and a new Draft document should be required.

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D. Environmental Issues

The boundaries of the Airfield Study Area, Figure 5.1-2, should be extended to include the Hyatt Hotel and the waters to the east of Governors Island, in order to include the runway safety areas and other protective envelopes.

D.1. Noise

Noise in the surrounding communities is the most serious negative impact of Logan Airport. The FAA and Massport have chosen to represent noise impacts through use of the Integrated Noise Model (INM). This model produces "contours" (lines of equal intensity) of "yearly day-night average sound level" (YDNL) in 5 decibel (dB) increments. FAA sets 65 dB(A) as the YDNL below which all land uses (including residential and "sensitive receptors") are compatible. Note especially that this metric is a yearly average number.

The weakness of this methodology is demonstrated by the examples of the Milton/Quincy/Braintree area and the Town of Hull. Neither at present nor under any future scenarios does the 60 YDNL contour (much less the 65 YDNL) include any portion of these communities. Yet residents of those areas are distressed by aircraft noise, as demonstrated by the aggressive participation of their representatives on the Community Advisory Committee (CAC). This concern, this impact, results from peak noise intensities (as partially expressed by the "times above noise level" metric), the frequency at which they are experienced, and the times of day during which overflights occur.

The most salient observation is that "equivalent operations" will increase substantially over almost all areas over time. The causes are increases in total jet operations and in nighttime jet operations ("Equivalent operations" is the sum of (nighttime operations x 10) plus daytime operations.) We have compared the base year, 1993, to Massport's projections for the 37.5M Low Fleet scenario. Both alternatives 1A (all options except peak period pricing) and Alternative 2 and 3 (no runway) were compared.

The Tables 3, 4 and 5 as follows, derived from the DEIS/DEIR Tables 6.2-3 and 6.2-4, display these comparisons. (It would have been preferable to compare against 1998, but adequate data is not available in the DEIS/DEIR.) Attention should be paid to those operations that impact significant populations (based on assumed flight tracks and the INM); departures on Runways 4, 9, 27 and 33, arrivals on Runways 4, 15, 22, and 27; and to the multipliers comparing "future fleet" equivalent operations to the base year.

Table 3
Equivalent Operations
Departures

Runway		1993	37.5M Low Fleet			
		"Base Year"	Alt 1A	% change	Alt 2/3	% change
4	%	10%	7.1%		6.6%	
	#	27,000	28,000	nil	26,000	nil
15	%	13%	14%		9.9%	
	#	35,000	56,000	60 %	29,000	10%
22	%	28%	23%		31%	
	#	76,000	92,000	20%	123,000	60%
27	%	12%	17%		8.6%	
	#	33,000	68,000	106%	34,000	nil
33	%	12%	11%		9.5%	
	#	33,000	44,000	30%	38,000	20%
9	%	25%	29%		34%	
	#	68,000	115,000	70%	135,000	100%

The % change reflects increase from 1993 Base Year Operations based on Alternative Scenario.
 Percentages (%) rounded to two significant figures throughout table. Totals may vary slightly due to rounding.

Table 4
Equivalent Operations
Arrivals

Runway		1993	37.5M Low Fleet			
		"Base Year"	Alt 1A	% Change	Alt 2/3	% Change
4	%	36%	34%		41%	
	#	98,000	140,000	40%	160,000	60%
15	%	3.7%	6%		1.8%	
	#	10,000	24,000	140%	7,000	(-30%)
22	%	12%	14%		15%	
	#	33,000	56,000	70%	64,000	90%
27	%	17%	13%		16%	
	#	46,000	52,000	10%	64,000	40%
33	%	32%	33%		26%	
	#	87,000	130,000	50%	100,000	15%

The % change reflects increase from 1993 Base Year Operations based on Alternative Scenario.
 Percentages (%) rounded to two significant figures throughout table. Totals may vary slightly due to rounding.

Of the 16 comparisons presented in Tables 3 and 4 (4 runways, arrival and departure, 2 alternatives), three comparisons show essentially no change in number of operations, one comparison shows a significant decrease, and twelve comparisons show increases ranging from 110% to 240%.

Table 5
Increases in Equivalent Operations
Future Scenarios to Base Year
(Percent)

<u>Departure Operations</u>			<u>Arrival Operations</u>		
<u>Runway</u>	<u>Alt 1A</u>	<u>Alt 2/3</u>	<u>Runway</u>	<u>Alt 1A</u>	<u>Alt 2/3</u>
4	nil	nil	4	40%	60%
9	70%	100%	15	140%	(-30%)
27	119%	nil	22	70%	90%
33	30%	20%	27	10%	40%

The conclusion drawn from Table 5 is that while the different alternatives slightly shift overflight impacts among communities, most residential areas will experience significant increases in impacts over time.

The plan to add another runway on the southern boundary of the airport will definitely alter the noise patterns for those south and southwest of the proposed runway. Although the noise level for Alternatives 1 and 2 appear to be similar, there are appreciable differences. The South Boston and Jefferies Point areas will definitely have an increase in noise above 60 dB and possible above 65 dB. Although the planned runway is to have all departures to the southeast, certain atmospheric conditions will affect the intensity of the additional noise in these areas. There is forecast to be an increase of five or more dB in approximately a three square mile area on the south shore of the Inner Harbor.

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Only four monitor locations were used on the south shore of the Inner Harbor for the airside analysis of sound level contours (Vol. 1, Figure 5.2-1), while the remainder were northeast, north and east of and in close proximity to the airport.

Two sensor sites to the west-northwest of the airport are those at the Jefferies Point Yacht Club and at Summer near Lawsom in East Boston. These two sites would receive ground noise from the jet engines as they taxi to Runway 14 and as takeoff power was applied. This noise is quite directional when the aircraft reaches full power. According to the day-night contours in the analysis, the noise level would never reach 60 YDNL. The Times Above Noise Levels (TANL) tables contradict

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these figures. The TANL analysis in the DEIS/DEIR Appendix L shows that there would be increases to the 65 YDNL threshold under all scenarios, including Alternatives 2,3, and 4. This is another illustration of the weakness of the YDNL contours in defining noise impact.

D.1.a Enhanced Preferential Runway Advisory System - PRAS Implementation

Noise abatement procedures, it is understood, are a significant concern of the Logan Airport Air Traffic Control Tower. However, the PRAS goals are advisory and may be declined by the Air Traffic Supervisor on duty after analysis of the recommended PRAS runways and weather conditions.

To change a runway configuration and move traffic to another combination of runways is similar to diverting a flow of water from one outlet to another with a similar receptacle without shutting off or spilling any of the water. Changing traffic flow to attain PRAS noise goals takes pre-planning by the supervisors and controllers. In many instances, a runway or traffic flow change can also require changes of traffic flow not only at the Boston Air Route Traffic Control Center but also at adjacent facilities. These concerns suggest that attainment of the PRAS goals will remain elusive.

Past experience with the PRAS system has demonstrated the difficulty of attainment of the PRAS goals. It is clear that capacity considerations and controller workload have taken precedence. We expect this situation to continue, and to be exacerbated by growth in operations over time.

We believe airfield operations are unlikely to attain, and even less likely to sustain, the progress toward attainment of PRAS goals that Massport projects. Therefore, the projected noise reduction "benefits" of the proposed project for the communities impacted by operations using the 4/22 Runways are not likely to be attained or if attained to be sustained. (Conversely, the projected noise increase "dis-benefits" of the proposed project for the communities impacted by operations using the 15/33 (and 14/32) Runway and by departures on Runway 27 are also less likely to occur.)

D.1.b Night-time Operations

The number of jet operations at night (Appendix H) is projected to increase significantly over time. The increase is from about 31,000 operations per year and 12% of all jet operations in 1993, to about 40,000 and about 14% of jet operations in the 29 million passengers scenario in 1999. A further increase to about 52,000 operations per year and about 16% of jet operations is projected in the 37.5 million/low fleet scenario, and to about 65,000 operations and 18% of

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jet operations in the 37.5 million passenger/high fleet scenario. In the 45 million passenger/high fleet scenario the projected increase is to about 89,000 annual operations, representing 23% of all jet operations. This shows projected major increases in nighttime jet operations from the 1993 level.

The trend is clear. The number of nighttime jet operations can be expected to double within the foreseeable future under conservative forecasts. The noise impacts of this increase are huge. All nighttime operations of jets weighing over 75,000# are required to be of Stage 3 aircraft, at this time. Therefore, the growth in numbers and percentage of nighttime jet operations will not be mitigated by the conversion to Stage 3 aircraft.

Table 6
Growth in Jet Operations

SCENARIO	Total Jet Operations	Daytime Jet Operations		Nighttime Jet Operations		Equivalent Jet Operations	
		Number	Percent	Number	Percent	Number	Increase
1993	262,200	231,000	88%	31,200	12%	543,400	-----
29M Low Fleet	297,900	257,500	86%	40,400	14%	661,200	22%
High Fleet	294,100	253,500	86%	40,600	14%	659,300	21%
37.5 M Low Fleet	331,400	279,800	84%	51,600	16%	796,200	47%
High Fleet	363,000	297,700	82%	65,300	18%	951,000	75%
45 M High Fleet	392,800	303,900	77%	88,904	22%	1,190,000	120%

This table is constructed from data and projections presented in the Logan DEIS/DEIR, Appendix H.

The last columns of the table above, also taken from Appendix H, apply the "nighttime noise equivalent" factor of 10 to the (forecast) nighttime jet operations to predict the "noise equivalent" number of jet operations during the year. This of course is not a forecast of actual operations. It is rather a statement that the predicted mix of operations in a particular scenario (year, passenger traffic, fleet, and resulting non-jet, jet, day, and night operations) would result in a noise impact equivalent to the impact of that number of operations if they all occurred in the daytime.

This is an important set of numbers, speaking eloquently to a critical element of the increasing impact of Logan on the communities in the coming decade. It should be a major factor in the debate about the long-term management of travel and communication for the Metropolitan area, and stresses the need to reduce dependence on and preference for air travel and Logan in particular. An alternative that should be considered is the creation of a cap on nighttime operations pursuant to FAR Part 161.

D.1.c Noise Monitoring by Massport - Late Night Preferential Runway Use

There has been a program at Logan for preferential use of over water approaches and departures, in effect from midnight to 6:00 a.m. The objective is to maximize the use of runway 15R for departures and runway 33L for landings during that period. The effectiveness of this program for the years 1995, 1996, and 1997 is reported on in the GEIRs. The program would appear to have some benefit, as reported, but is not discussed in the DEIS/DEIR. The data presented in the GEIRs suggest a higher potential benefit in the initial year of operation than in the last reported year, comparing the percentage of time that those two runways were designated as the active runways during that midnight to 6:00 a.m. period. The DEIS/DEIR should report on the current status of the program, and discuss/explain the apparent diminution in its application. **The construction of Runway 14/32 would not enhance the opportunity to utilize this program nor increase its benefit.**

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D.1.d Flight Tracks

The 1997 GEIR Update contains an analysis of flight tracks on departures from various runways. The principal observations from this report are that a significant number of flights re-crossed the shoreline over Hull and were also below 6,000 feet. This is true for departures from 15R (although the numbers are relatively small) and from 22R/22L, where only 42% of the crossings through Hull No. 2 gate were above 6,000 feet. This may explain the level of concern of aircraft noise in Hull.

Comparison of the report of the flight track monitoring program in the 1994/1995 GEIR Update with that reported in the 1997 GEIR Annual Update shows the following. While the number of aircraft departing Runways 22 that subsequently cross the Hull peninsula on their westbound leg did not increase appreciably, the percentage of aircraft crossing that peninsula below 6,000 feet increased from about 8% to about 42%! (The noise abatement procedure for runway 22 departures is to pass north of the Hull peninsula on the eastbound departure and to pass across the shoreline south of the Hull peninsula at an altitude of over 6,000 feet on the westbound return leg.) It appears from the data that a significant percentage of operations failed to conform to the procedure in two ways--the Hull peninsula was crossed, and it was crossed at less than 6000 feet altitude.

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The 1997 GEIR Study does not report on compliance with the flight tracks for Runway 27 departures as established by the FAA in 1996. The CAC representatives from the Runway 27 coalition are vociferous in their complaints about failure to comply with the agreed-on departure procedures, which were developed as part of the Runway 27 DEIS/DEIR. Massport reports that in 1997

85.129

the FAA initiated an action plan to improve compliance with the Runway 27 flight corridor.

D.1.e Benefits of Further Conversion to Stage 3 aircraft from Stage 2 aircraft

The Logan Low-Frequency Noise Study reported in 1996 by Harris, Miller, Miller & Hanson, Inc. indicates that Massport overstates the benefit of further conversion to Stage 3 aircraft on future noise levels around Logan Airport. First, there is only minimal conversion left to be accomplished, as Massport reports that the percentage of aircraft using Logan that meet the FAA criteria for Stage 3 is about 85% at present. Second, the HMMH Report indicates little or no "Stage 3" benefit (a) under the flight track of arriving aircraft, (b) during thrust reversal, and (c) to the sideline of arriving aircraft; and only limited benefit to the sideline of departing aircraft. The principal benefits, according to the HMMH Report, will be experienced under the flight track of departing aircraft and to the rear of departing aircraft at the start of roll.

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The impact of flight operations on persons living under or near flight tracks has been assessed and evaluated using a number of approaches and metrics, as reported in the DEIS/DEIR. These include the YDNL contours, dwell, persistence, and "time above" a selected noise level. The interference and annoyance associated with flight operations is, of course, felt in a given area only when the particular flight path is in use. During those periods, the important factors are the loudness of the event (including a nighttime correction), the frequency at which the event occurs (or the interval between events), the duration of the period during which the event occurs, and whether the event occurs during a noise-sensitive period, *i.e.*, nighttime. Enhancement of the ability to evaluate and to report this form of impact might allow those concerned to better understand community perceptions of aircraft noise and the lack of broad community acceptance of the use of YDNL contours as an adequate means of expression of aircraft noise impacts.

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D.1.f "Soundproofing"

Application of measures to reduce sound transmission through building envelopes to interior spaces, called "soundproofing" but more accurately termed "acoustic treatment" can certainly be beneficial in providing a degree of respite from aircraft noise. When accompanied by whole-house air-conditioning (to allow the window barriers to remain in place year-round) it can provide year-round benefits indoors. There are several drawbacks. First, it is impossible by this technique to improve ambient conditions outdoors. Second, it reduces communication and contact of those within the structures with the outside environment, in effect "cocooning" residents within their houses. Third, as a principal objective and effect of the

"soundproofing" program is to reduce or eliminate noise pathways through the structure, this also reduces air exchange between the structure and the ambient air, trapping within the structure air contaminants that are generated therein. Thus, a byproduct of "soundproofing" is an increase in the potential for interior air contamination in the absence of mechanical ventilation.

This is not an argument that "soundproofing" is a bad idea or should not be continued and intensified as a mitigation measure for otherwise unavoidable aircraft noise impacts. It is, however, a statement that acoustic treatment should not be regarded as a full substitute for reduction in ambient levels of aircraft noise.

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Concerns about Massport's residential "soundproofing" program include the pace of the program, as Massport has had a target of completing the program in 15 years, or the year 2000. Massport depends on FAA grants for the funding of this program and is therefore limited by FAA eligibility rules as to the location with respect to noise contours of units for which "soundproofing" may be provided. FAA Order 5100.38A makes ineligible for AIP funding any non-related code-required building improvements necessary to accommodate acoustic treatment improvements. This may impose significant burdens on some property owners.

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Another concern is the failure to provide air-conditioning in conjunction with the "soundproofing" program. Note that according to the DEIS/DEIR, the FAA grants provide for 80% of the cost of the program, with Massport providing 20%.

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A further concern is the eligibility of dwelling units for the program. At present, eligibility is determined by the location of the unit within the 65 YDNL noise contour, as determined by the application of the Integrated Noise Model (INM). Massport should consider whether other factors should be included in the determination of eligibility that might not be adequately captured by the use of the 65 YDNL noise contours. Consideration should also be given to establishment of an interior noise level goal for the program regardless of location of the dwelling unit. Any restructuring of the program should be undertaken with full communication with the interested and affected communities.

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The shortcomings of the INM should be recognized and accommodated in the further development of the acoustic treatment program and with respect to eligibility for the program. The disparity between YDNL levels projected using the INM and dB levels measured in the field is well demonstrated around Logan Airport. Credence should be given to the measured values in determining eligibility and design of corrective measures.

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D.1.g School Sound Insulation Program

Massport reports that all schools eligible for the "soundproofing" program have been treated. That is certainly positive. However, the statement does not address the question of whether the treatments have been adequate or sufficient in every school to which they have been applied, or the question of whether all schools that would benefit from some form of acoustic treatment have received that benefit.

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D.2 Air Quality/Odors

The issues with respect to air quality impacts of the Logan Airside Improvement Planning Project are (1) shifting of existing emissions to other locations on and around the airport, and (2), overall growth in aircraft and motor vehicle emissions operations and emissions.

Shifting or relocation of aircraft engine emissions and impacts will follow and relate to changes in runway and taxiway utilization that are projected to occur under any of the "build" alternatives. Generally, these changes in impact locations will mirror the shifts in noise impact. The change in air quality impact most likely to be detected is that of odors.

D.2.a Odor Assessment

(Please refer to the Appendix B - "Analysis of Odor Complaints at Logan Airport" memorandum of March 27, 1996 to the Community Advisory Committee).

Changes in odor impacts are most likely to occur in the Jefferies Point neighborhood from takeoffs on Runway 14 (taxiing aircraft approaching the runway and holding, and start-of-roll thrust and resulting emissions). The wind direction during use of Runway 14 for takeoff will, of course, disperse odorous contaminants in the general direction of Jefferies Point. This would constitute a new source of odors in the Jefferies Point area and would also affect the Hyatt Hotel.

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Increased use of Runway 15 for takeoffs can be expected to have an influence on odor impacts downwind of Runway 15 in the Bremen Street/Eagle Hill area of East Boston, due to increased emissions from taxiing, holding and start of takeoff roll. In this case, as contrasted to Runway 14, this would not be a new source of odors, but rather, an increase in the frequency during which the source was active. An odor receptor location in East Boston representing the most proximate residential receptor located along or near the extended centerline of Runway

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15R/33L should have been selected for odor modeling rather than Location 10 at the intersection of Condor and Glendon Streets.

The construction and use at the Centerfield Taxiway would change odor impacts in the Bayswater Street area of East Boston. Increased stacking of taxiing aircraft in the northern portion of the airport would increase odor source strength, a minor shift of taxiing operations from Taxiway November to the Centerfield Taxiway would slightly increase the dispersion and dilution of odors prior to reaching the Bayswater Street area (compared to emissions from aircraft on Taxiway November). The use of the Centerfield Taxiway would place taxiing aircraft closer to the Court Road section of Winthrop, where the odor impact would depend on the crosswind component during operations on Runways 4 and 22.

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Responses to changes in odor strength are logarithmic in nature, as pointed out in the K. M. Chng Environmental Report of 1996 and in the attached memo of David Standley of March 27, 1996. Therefore, it is entirely possible that changes in odor emission intensity/source strength as they may affect Bayswater Street and Winthrop will not be sufficient to be noted by residents. However, the introduction of a new source, as in the case of Runway 14, is very likely to be detected, noted, and complained of. The same is probably true of an increase in frequency at which detectable odors are present, as could be the case for increased use of Runway 15 for takeoffs.

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Improvements in efficiency of ground taxi operations, while potentially yielding or resulting in reduction in odorous emissions generally on the airfield, are not likely to be detected in the neighborhoods as reductions in odor intensity.

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D.2.b Dispersion Modeling Results

These results show that growth of operations at Logan Airport will increase contaminant concentrations over time at most modeled locations, although the modeled concentration of selected air contaminants are within applicable ambient air quality standards or guidelines. The modeled increase in one-hour predicted levels of Volatile Organic Compounds ("VOCs") is of particular concern. This class of compounds is used as a surrogate for odorous compounds. The projected increase in concentrations from the 1999, 29 million-passenger scenario to the 2010, 37.5 and 45 million passenger scenarios is more than sufficient to elicit negative responses from exposed populations. It appears from the modeling results that the principal determinant of overall changes in VOC emissions would be the Taxiway Improvement Program. Runway 14-32 would have little impact on total emissions from aircraft sources, although as noted above its use would introduce a new odor source to Jefferies Point.

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Over this same time frame, nitrogen oxide emissions from aircraft sources at Logan Airport are predicted to increase by about a third irrespective of the alternative selected. Particulate matter ("PM10") emissions also increase by as much as a third from the 29 million to the 45 million-passenger scenarios, irrespective of alternative selected. These increases in emissions appear to be due in large measure to increased operations, in part to changes in engine design.

Combining Tables E-13 and E-14 shows that for all modeled contaminants other than VOCs, the difference (if any) among Airside Improvement Project alternatives is much less significant than the projected growth of emissions over time. The direct or indirect comparison of various alternatives to the baseline year 1993 is misleading. Conditions have changed substantially since 1993 in many respects, and emission estimates for the various alternatives and for the various scenarios should be compared to 1998, the most current year for which operational data are available.

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VOC emission estimates from aircraft sources are anomalous in that the data presented indicate essentially no increase in emissions over time despite growth in operations and regardless of alternative modeled. It is unclear why aircraft VOC emissions are not projected to increase with increasing numbers of aircraft operations. Massport models "odor indicator" emissions as VOCs from low-power aircraft operations in Tables ES-13 and ES-14. The K. M. Chng Environmental Study of 1996 reports that high-power operations (runup and takeoff roll) may be significant sources of emissions of odorous compounds despite lower concentrations during that mode of operation, because of the high volume of contaminants discharged, yet this mode was not incorporated in the "odor emission" estimates.

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The dispersion modeling protocol used for the DEIS/DEIR utilized the 1993 year-of-record of meteorological data as input to the dispersion model. Massport used a ten-year hourly average of meteorological conditions at Logan as input to the DELAYSIM Model for calculating delay times associated with various alternatives and runway configurations. Massport should have used the same ten-year hourly average meteorological input for the air quality dispersion model, and should be required to rerun the dispersion model for all of the conditions modeled for the DEIS/DEIR (Section 3.1.2 Dispersion Modeling, page 6-67). Further, for odor modeling alone, it should be recognized that any problem of odor detection and nuisance is associated with conditions that will provide the maximum exposure concentration and maximum response characteristics, as set forth in the K. M. Chng Environmental Report.

85.146

The use of the EPA Industrial Source Complex Dispersion Model utilizes too long an averaging time to adequately model peak odor concentrations, which is the

85.147

stimulus of concern for odor response. Furthermore, averaging over a one-hour period essentially washes out the peak concentration profile. The modeling that was performed should be supplemented by the application of a "puff" model utilizing reasonable worst-case dispersion and dilution conditions and short-term peak emission rates, in addition to the factors set forth in the Chng Report. For all of the above reasons, the odor modeling and odor impact assessment procedure is inadequate.

85.148

No references are given for the assertion that newer engines associated with Stage 3 aircraft produce lower hydrocarbon emissions. The DEIS/DEIR demonstrates that complete conversion to Stage 3 aircraft in the fleet at Logan must (a) be accomplished by the year 2000, (b) will affect less than 15% of the current fleet, and (c) will occur independently of the Airside Improvements Project. Thus, the assertion that odorous emissions will decrease over time has not been substantiated.

85.149

D.3 Endangered Species - Upland Sandpiper

A program is required for off-site mitigation to compensate for impacts to the nesting habitat of the state-listed endangered upland sandpiper on Logan Airport. The suggested program appears highly speculative, and seems irrational with regard to protection and enhancement of so much of the species as tends to reside in and utilize habitat in the Boston Metropolitan Area. Camp Edwards on Cape Cod is over 50 airline miles from Logan Airport, in a completely different ecosystem. Massport should be required in the DEIS/DEIR to define a project fully acceptable to the Massachusetts Natural Heritage and Endangered Species Program that involves creation of a comparable habitat and its protection and preservation in the Metropolitan Area. Massport has been aware of this issue for several years, has had ample time to resolve the matter with NHESP, and should be required to set forth the resolution in the DEIS/DEIR.

85.150

D.4 Water Quality

The presentation for minimizing water quality impacts during construction is completely inadequate and is substantively limited to the one paragraph on page 6-94. There is no discussion of erosion and siltation control measures, best management practices during construction, of grain size distributions and loading that might be expected from runoff during construction or of proposed acceptable discharge rates to avoid siltation of adjacent wetlands. There is also one sentence each on pages 6-96 and 6-97, which refer to plans not yet developed or permits not yet issued. Reference is made to Massport standard programs for construction at Logan, but these are not attached to the DEIS/DEIR nor cited by title and location for reference.

85.151

D.5 Soils Management

Massport has performed no soil sampling and analysis in the principal areas of proposed excavation for the planned construction projects. Of particular interest would be the cargo and general aviation ramp areas in the vicinity of the proposed Runway 1432. The soil sample data presented in Section 6.6.4.1 cannot be considered potentially representative of any of the proposed construction areas.

85.152

Massport has indicated that the principal means of disposal of excavated material will be as landfill cover and contouring material. Experience with other projects demonstrates that the Central Artery Project has substantially saturated the demand for materials for those purposes within reasonable haul distances. While the shortage of capacity will principally be a cost factor, it could also affect proposed construction schedules.

85.153

Without information on the source of the hydraulic fill in the eastern portion of the airfield (Taxiway Delta Extension Section 6.6.4.3), no assumption should be made about the chemical characteristics of the underlying material.

85.154

The total volume of soil to be disposed of, from the DEIS/DEIR, appears to be a minimum of approximately 800,000 cubic yards, and depending on the results of field sampling prior to construction, could be considerably greater. Generation of the bulk of this material would occur in the first two years of the project. While this volume is less than 10% of the total volume of material that is being managed as part of the Central Artery Project, its management and disposal is a significant program. The DEIS/DEIR treats this matter far too casually.

85.155

D.6 Construction Impacts**D.6.a Construction Activities**

The statement that construction work with limited exception would only occur during the months of January, February and March, weather permitting, is puzzling. It is not consistent with Table 6.7-3; it is not clear why Massport would select two of the months that are normally the most problematic because of weather, and years 2, 3, 4 and 5 in Table 6.7-3 specifically show no construction activity in the first quarter. This matter needs to be clarified.

85.156

It is apparent from the construction schedule that Massport intends to first implement its capacity enhancement projects, Runway 14/32 and the Centerfield Taxiway.

D.6.b Ground Transportation

Massport should explain how construction workers would access the site, based on experience with other recent Massport construction projects. Will contractors be required to provide off-airport worker parking with shuttle buses to the airfield construction site? How will the potential for parking, legal or otherwise, in East Boston be minimized? (Page 6-129)

85.157

D.6.c Air Quality - Fugitive Dust during Construction

The most likely sources of fugitive dust during construction are wind erosion of exposed soils and dust re-entrainment during vehicle passage. The areas most likely to be affected by fugitive dust are those within a few thousand feet of soil movement and transport activities, such as Court Park in Winthrop, Bayswater Street and Jefferies Point, and the South Boston Waterfront, including Fort Independence. Massport proposes street sweeping and wheel-well washing, and use of water sprays, to minimize dust generation. These are reasonably effective measures if implemented in a proper manner and at a proper place. However, it is assumed that Massport will not construct and operate wheelwash facilities on the airfield, but rather, will establish them at the southerly end of Harborside Drive and perhaps at the North Gate (although locations are not mentioned in the DEIS/DEIR). To minimize dust generation on the airfield, Massport must use spray trucks or "water wagons." However, such systems, and wheelwash operations, are not feasible during sub-freezing weather without the (costly) addition of chemical freezing point depressants to the water. Massport has failed to demonstrate how fugitive dust emissions from construction operations on the airfield during winter months will be controlled.

85.158

Wheelwash facilities generate considerable quantities of silt and sediment-laden water. Massport has not discussed how discharge of these contaminants will be controlled. Settling methods or "sedimentation boxes" are ineffective with respect to fine particles in the water stream.

85.159

D.6.d Construction Noise Impact

Massport proposes to use the Federal FHWA Criteria for construction noise impact. Massport fails to recognize the criteria applied by Massachusetts Department of Environmental Protection, which limit construction noise increases to 10 dB(A) above background and prohibit pure tones as defined by DEP (DEP Policy 90-001). These criteria are applicable to this project.

85.160

Other shortcomings of the Massport construction noise analysis are its failure to address the matter of pure tones and of impact noise (*i.e.*, paving breakers and

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hoe rams), and the failure to separate out and separately analyze nighttime construction noise levels against nighttime ambient levels, in addition to the information on projected day DNL levels in Table 6.7-6.

Should this project be finally approved, the Record of Decision and the Section 61 Findings should clearly incorporate the construction impact mitigation measures set forth in Section 6.7 of Volume I of the DEIS/DEIR, as amended by any additional measures incorporated as a result of these or other comments.

How will construction vehicles accessing or exiting via the North Gate be precluded from use of local streets?

The Soils Use Policy and the Stormwater Pollution Prevention Plan (Section 6.7.5.4) should be available for and subject to public review and comment.

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D.7 Cumulative Impacts

The statement is made, "After sound-proofing to mitigate impacts within the 65 YDNL Contour, the full-build alternatives provide net long-term benefits." We disagree with this statement. As discussed elsewhere in these comments, the soundproofing program has significant limitations in terms of the benefits provided.

85.164

There is potential for adverse odor impacts in certain areas proximate to the airport, as a result of this project. The proposed Airside Improvement Project provides minimal long-term air quality benefits. With the exception of odor impacts, changes in air quality associated with the proposed project are likely to be undetectable.

85.165

The statement expressing total peak construction trips as a percentage of the average annual daily traffic on the regional highway system is misleading, since most of the construction-related traffic consists of heavy vehicles. These vehicles have significantly greater traffic impacts than do passenger vehicles.

85.166

This Draft Environmental Impact Report is submitted subject to Massachusetts laws, policies and regulations, in addition to federal regulations and guidance (page 7-3). As such, it is subject to the determination of the Secretary of Environmental Affairs as to whether cumulative impacts have been adequately addressed.

Federal planning policy⁵ establishes that this project must be considered and evaluated as stimulating growth in aircraft operations at Logan. The DEIS/DEIR makes a clearly contrary statement (page 7-3). "The Airside Project has independent utility, and will not stimulate, preclude, or otherwise . . ." In our opinion, this statement is incorrect.

85.167

D.7.a Relationship to the GEIR

The planning period is inadequate, and should be extended to 2020. There is no plan or program to deal with long-term growth at Logan, which will soon overwhelm any interim benefits of this project. There are measures that could be instituted to effectively address transportation in eastern New England, but there is no discussion in this document.

85.168

85.169

As stated above, the Secretary of Environmental Affairs should determine that these significant planning deficiencies exist in the DEIS/DEIR that must be addressed. The DEIS/DEIR should be found inadequate, and a new Draft document should be required.

85.170

Delay does not appear to be a major problem at Logan, based on FAA reports and Massport's 5-year history of inaction.

85.171

D.7.b Relationship to Other Logan Projects

This project and landside projects at Logan are interdependent, and both will increase capacity and stimulate demand.

85.172

D.7.c Long-Term Cumulative Effects

The Airside Improvements Project is already "divisive and disruptive of established communities," and prospects for the long term are significantly worse.

85.173

With respect to Section 7.3.1 - Noise - it is necessary to iterate that the "sound-proofing" does not fully mitigate for the impacts of increased overflights and increased ambient noise. With respect to odor impacts that may be associated with the proposed project, we believe the modeling approach used by Massport to be flawed and to require substantial enhancement.

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⁵ FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", e-4 "Regulatory Changes in Capacity at Access Capped Airports"

E. Modeling

E.1 Approach to Delay Modeling

There are a number of different models available⁶ for determination of capacity and delay analysis including: LMI Runway Capacity Model, FAA Airfield Capacity Model, AND (Approximate Network Delays), The Airport Machine, SIMMOD, TAAM (Total Airspace & Airport Modeler), HERMES (Heuristic Runway Movement Event Simulation), NASPAC, TMAC, FLOWSIM, and ASCENT. It is assumed that Massport used the commercial software model "The Airport Machine" developed by Airport Simulation International (ASI) for the evaluation of the taxiway demand, capacity and delay; however, no specifics were given on the development of the model. It is curious why Massport did not use the FAA-approved SIMMOD model for the airport simulations. "The Airport Machine, which costs about \$20,000 for a site license, offers less flexibility and options than SIMMOD and is a largely deterministic model."⁷

There is no discussion on the selection of the model for estimating delay. Section 1.4.1 describes two measures of delay, ATOMS and ASQP data. In 1997, according to an FAA published report⁸, the FAA had two delay reporting systems, Operations Network (OPNET) and the APO Total Cost for Air Carrier Delay Report. In addition, DOT publishes the Air Travel Consumer Report (ATCR) and the Air Transport Association issues a report on member airlines.

FAA's Office of Aviation Policy and Plans (APO) has created the "Consolidated Operations and Delay Analysis System (CODAS) to provide estimates of aircraft delay by individual flight. "APO's main objective was to develop a clear and well-supported methodology to calculate aircraft delays that will be accepted by both government and industry as valid, accurate and reliable. Because the acceptance of the CODAS delay estimates are the key to its usefulness, APO coordinated the development of CODAS with other FAA organizations and major air carriers and continues to do so."⁹

⁶ Modeling Research Under NAS/ATT, "Existing and Required Modeling Capabilities for Evaluating ATM Systems and Concepts", International Center for Air Transportation, MIT, March, 1997

⁷ Modeling Research Under NAS/ATT, "Existing and Required Modeling Capabilities for Evaluating ATM Systems and Concepts", International Center for Air Transportation, MIT, March, 1997, page 17.

⁸ FAA, Office of Aviation Policy and Plans, "Documentation for the Consolidated Operations and Delay Analysis System", September 1997, page 1.

⁹ FAA, Office of Aviation Policy and Plans, "Documentation for the Consolidated Operations and Delay Analysis System", September 1997, page 3

The CODAS information should be incorporated into the models developed (FLAPS and DELAYSIM) for the evaluation of the airside improvements at Logan. CODAS also calculates taxi in and out time and delay and should be considered in lieu of The Airport Machine.

85.177

It is unclear why Massport chose to develop its own model for estimating delay when FAA has developed a model to do the very same. Massport chose to use the FAA INM model for reviewing the effects of noise on the community. However, they choose to use non-standard models like the Airport Machine, DELAYSIM, and FLAPS instead of SIMMOD and CODAS.

85.178

The models used including FLAPS and DELAYSIM appear to have been developed exclusively for analysis of Logan. Background information on the development of these models is not presented. The models have not been verified or compared with historical information nor has it been shown that the development has been coordinated with FAA or the airlines. Based on 40 CFR Part 1502 requirements of preparing Environmental Impact Statements¹⁰ " . . . Material based on proprietary data which is itself not available for review and comment shall not be incorporated by reference," this usage is inappropriate.

85.179

E.2 Airside Delay Modeling

The Airside delay model (DELAYSIM) used hourly weather observations from 1981-1990. Not only does this not correlate either to Massport's base year or to the recommended 1998 base year, it uses data that is over 17 years old. Weather patterns have changed significantly within the last five years due to effects from El Nino and La Nina. The selection of the weather data does not provide current information as background for the selection of the runway configurations.

85.180

One of the assumptions of the DELAYSIM model is that an air traffic controller first chooses 1) highest capacity configuration, then 2) the configuration that most closely meets the PRAS goals. We believe this assumption is not supported by historical data on the actual percentages of runway use configuration. No data is presented to show recent improvement due to the availability of Enhanced PRAS (EPRAS).

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85.182

The DELAYSIM model should withdraw the PRAS goal decision-point as a runway configuration selection criteria and provide the model results using, as the leading criteria, the highest capacity configuration and air traffic controller workload weightings approved by FAA ATC. This approach would be a more conservative approach reflecting historical operational selections by the FAA ATC personnel. FAA's primary responsibility is to provide safe and efficient aircraft operations into

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¹⁰ Council on Environmental Quality, 40 CFR Part 1502.21

and out of Logan. To try to model the ability of FAA to adhere to a volunteer noise program (PRAS) is not appropriate in simulating the "worse-case" or "highest capacity" operations. Moreover, Logan has indicated that continued growth is expected; thus, FAA will focus on its primary responsibility of efficient aircraft operations.

It should be noted that PRAS goals have not been met by the FAA since establishment. For the model to assume the attainment of PRAS goals will improve significantly is unrealistic and underestimates the operations over specific communities. While it is important for the FAA to be encouraged to meet the PRAS goals, it is impractical to consider the goals as a significant factor in FAA operational decisions.

85.184

The methodology of the DELAYSIM model as applied by Massport provides output that reflects a "best-case" though unrealistic scenario, and warps the follow-on analysis of the environmental issues.

85.185

The assumptions made by the DELAYSIM model do not account for stimulative effect that would occur if these improvements are implemented. FAA's Economic Analysis of Investment and Regulatory Decisions - Revised Guide provides specific guidance regarding the evaluation of delay and the stimulative effect that reducing delay will have by increasing demand. The following is for review from this document:

85.186

"Capacity Increases which Reduce Congestion Related Delay - Two definitions of capacity are relevant in defining the relationship (between delay, capacity and system demand). One is the "through put" measure. It defines the absolute number of system users that can be served in a given period of time, provided that a user is always present waiting to use the system. The second measure is that of "practical" capacity. It provides a measure of the ability of a given system to accommodate users subject to some maximum acceptable level of delay.Average delay is low at low levels of demand and increases as demand approaches capacity, as defined under either definition. As demand exceeds "practical" capacity, delay exceeds the acceptable level. And as demand pushes up against "throughput" capacity, delays begin to become infinite. This occurs because the number of users demanding service, per time period, begins to become greater than the ability of the system to serve them, resulting in an ever growing line of users waiting for service.

It is important to note that delays begin to occur before capacity, under either definition, is reached. This happens because of the random nature in which system users demand services. If all users of a system consistently arrived at evenly spaced intervals, the system could provide service hourly to a number of users equal to the "through put" capacity rate. No delay would occur until "through put" capacity was

actually exceeded. In actuality, system users do not arrive consistently at evenly spaced intervals. Sometimes several users arrive at one time and sometimes no one arrives. As a consequence, some of those who arrive at the same time as do others must be delayed.

Measurement of capacity and delay benefits requires that the relationship depicted in Figure 3-2 be determined for both the existing system and the proposed new one. The general form of such relationships is shown in Figure 3-3. Each has the same general form as that of Figure 3-2, but with the proposed new system having greater capacity and lower average delays than the old one at each level of demand.

85.187

The average delay reduction per system user at the current level of demand, D_0 , is $M_0 - M_1$ minutes. This is not the delay reduction that will occur if the indicated capacity increase is provided at demand level D_1 after system users have adjusted to the increase, however. Capacity improvements will reduce the costs of using the system both in terms of passenger time and aircraft operating expense.

As indicated in Figure 3-1, cost reductions will generally lead to an increase in the quantity of any good or service demanded. In this case, assume system demand increases from D_0 to D_1 resulting in delay of M_2 per user. This level of delay is above M_1 and represents that level which will result from the indicated increase in capacity once demand has adjusted to the lower costs brought about by the capacity increase."¹¹

The DELAYSIM model does not take into account the capacity increase because of stimulated demand. This model also provides a higher value of delay savings because it is measuring the savings from $M_0 - M_1$ and not $M_0 - M_2$. Since FAA includes recognition of the stimulation effect in determining delay reduction, the model Massport uses should do the same.

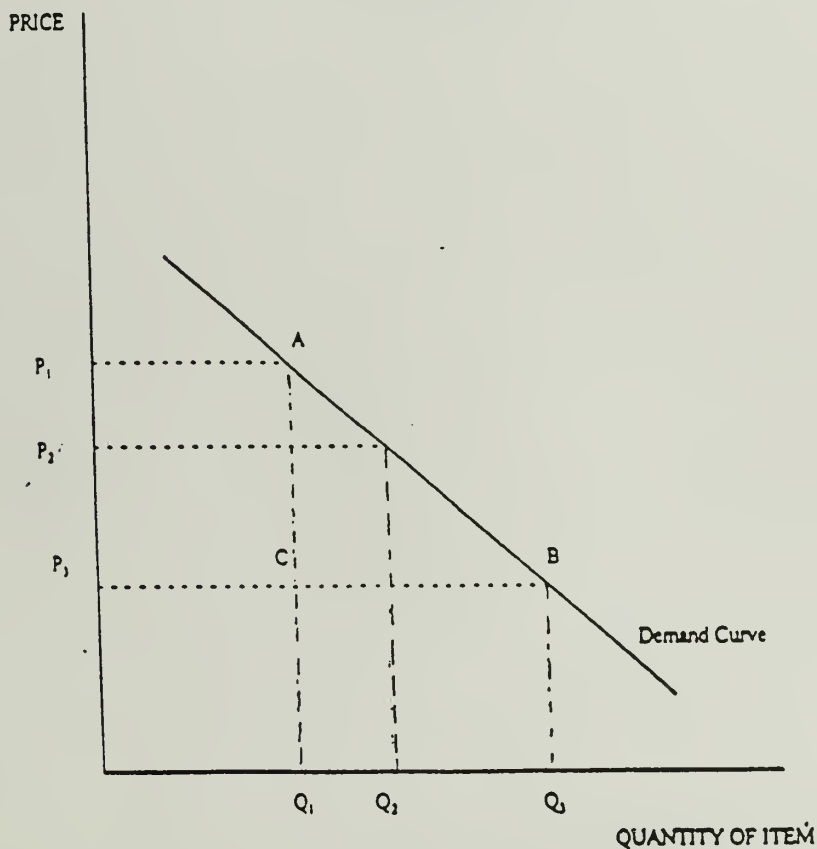
85.188

The FAA Technical Center at Atlantic City, New Jersey, should assist in simulating operations of the proposed new runway to verify the validity of the sole-source models used by Massport.

85.189

¹¹ FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", B "Capacity Increases which Reduce Congestion Related Delay", page 3-11.

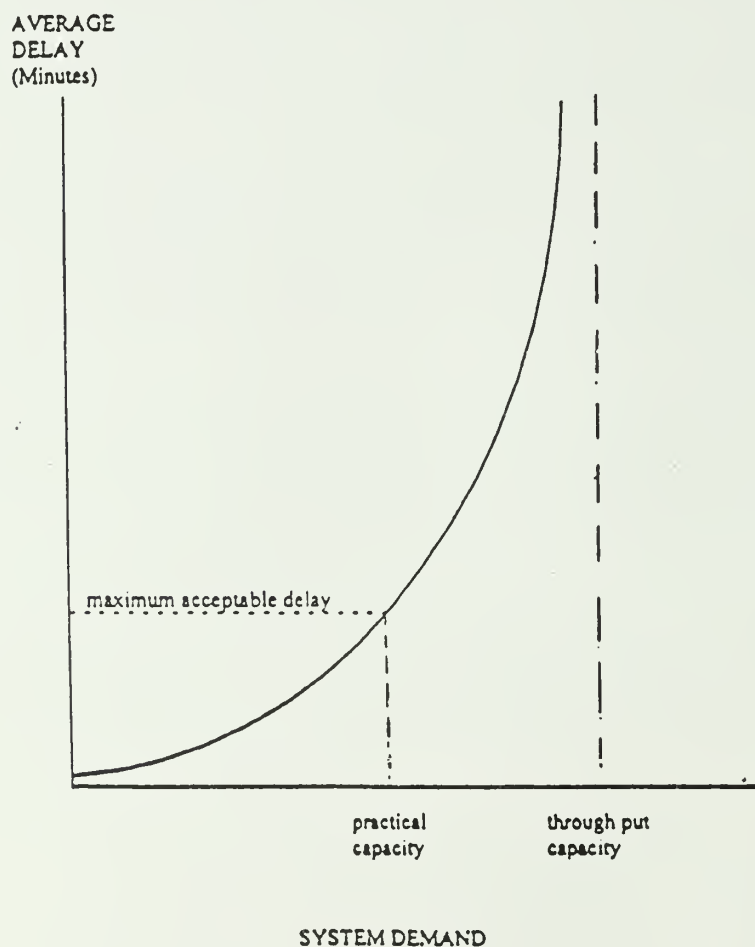
FIGURE 3.1¹²
TYPICAL DEMAND CURVE



¹² FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", B "Capacity Increases which Reduce Congestion Related Delay", page 3-3.

FIGURE 3-2¹³

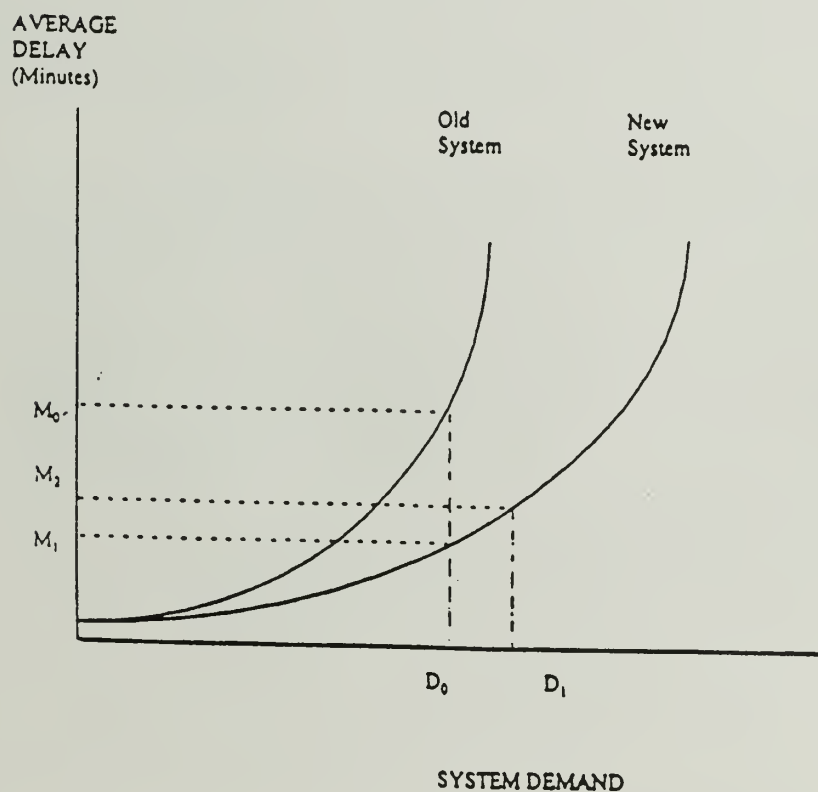
RELATIONSHIP BETWEEN CAPACITY
AND AVERAGE DELAY



¹³ FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", B "Capacity Increases which Reduce Congestion Related Delay", page 3-12.

FIGURE 3-3¹⁴

DELAY REDUCTION MEASUREMENT



¹⁴ FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", B "Capacity Increases which Reduce Congestion Related Delay", page 3-14.

F. Delay

F.1 Introduction

Massport proposes addressing the delay problem in a limited way through the Airside Improvements Project, and to address impacts of ground traffic through increasing the usage of high-occupancy vehicles and through regional transportation improvements by others. However, Massport's Airside Improvement Project proposals will not preclude increases in the delay experienced by airlines and their passengers. By its own calculations, that delay under the most optimistic scenario will return to present levels within a very few years and increase after that.

85.190

The cited 1998 121,000 hours of delay equates to over 13 years of delay to a single aircraft. If this delay is divided among 10 air carriers, it equates to the operating expenses of one multi-engine passenger jet operating 24 hours a day for 1.3 years for each of the airlines. If these were true delays, many of the airlines involved in this area would already have found alternatives to operating from Boston.

The analysis of delay shows a 10 percent reduction in modeled delay for 1999 with implementation of Option 1A unless the air traffic increases to a projected higher number, in which case the projected delay will be above that modeled for 1998 traffic. Actual air traffic will likely fall somewhere between the two, and the delay for 1999 is likely to approximate that estimated for 1998. By 2010 projections, with all improvements completed and a low air traffic projection, runway delays are estimated to be approximately 171,900 hours, or 40 per cent more hours of delay than those estimated to have occurred in 1998. In view of these projections, it is apparent that building and operating an unidirectional Runway 14/32 is but a band-aid.

The DEIS/DEIR statement that if no actions are taken, Logan's annual runway and taxiway delays will rise from today's modeled level to a modeled level exceeding 596,000 hours in the 2010 45M High Fleet scenario ignores the multitude of other factors that would affect industry and passenger decisions. The modeling scenario of 596,000 hours for 656,000 forecast operations would have one believe that all flights would be delayed an average of 53 minutes per flight. The forecast delays, if all actions are taken, will still be double the 1999 forecast levels, or an approximate average of 21 minutes per flight.

85.191

Although expenditure of these funds to patch the Logan airfield may reduce forecast delays compare to the "no action" alternative, the delays will still be insurmountable. What will happen in 2010? Will Massport be back with another "patch" or will the visionaries realize that you can only patch something so many times and then something new has to be done? This was and is now the case in the Washington, DC area with Washington National and Washington Dulles Airports, with Houston

Intercontinental and Houston Hobby, with Dallas Love Field and Dallas/Fort Worth airport, with the New York City airports, with Chicago, etc. The cities and airports have continued to flourish with both the old and new airports. It has been proven that major cities can support more than one airport and that the older airports continue to thrive.

F.2 Calculation of Delay

The DEIS/DEIR indicates that the FAA's congestion threshold of 20,000 annual hours is used to identify severely congested (i.e., delay prone) airports. In 1997 and 1998, FAA¹⁵ reported total operations delayed more than 15 minutes were 12,500 and 16,400; respectively.

The DEIS/DEIR indicates that "in 1998, it is estimated that Logan experienced approximately 121,000 hours of runway delay," this information is referenced between information on FAA OPSNET statistics and FAA's congestion threshold. In fact, the 121,000 hours of delay was generated by Massport's model and not by FAA. Presentation of this data, without reference, is misleading.

85.192

Information is provided on the delay as tracked by FAA, and Table 1.4-1 presents Logan's delay rank among U.S. Airports. It is useful to review this information, and a summary of the OPSNET information for the top ten delayed airports is presented in Tables 7 and 8.

In Table 8, delays due to equipment result from non-operating air traffic control equipment (not airline equipment); delays due to volume are included from both terminal volume and center volume; delays due to runways include closed runway for repair or reconstruction; delays due to weather "are largely the result of instrument approach procedures that are much more restrictive than the visual procedures in effect during better weather conditions. During the past few years, the FAA has developed new, capacity-producing approach procedures that take advantage of improving technology."¹⁶

¹⁵ FAA Air Traffic Operations Managements System - OPSNET for the 55 Select Airports Calendar Year Comparison

¹⁶ 1994 Airport System Capacity Improvement Report, Section 1.4.2 Delay by Cause.

Table 7
FAA Statistics on Airports
with Delays of 15 Minutes or More Per 1,000 Operations¹⁷

<u>Delays Per 1,000 Operation</u>									
<u>Airport Name</u>	<u>CY90</u>	<u>CY91</u>	<u>CY92</u>	<u>CY93</u>	<u>CY94</u>	<u>CY95</u>	<u>CY96</u>	<u>CY97</u>	<u>CY98¹⁸</u>
Newark Int'l Arpt.	84.94	67.26	83.48	87.88	74.29	33.81	65.25	57.89	69.08
N.Y. LaGuardia Arpt.	86.79	61.63	55.23	38.32	47.37	33.65	46.22	49.03	68.40
San Francisco Int'l Arpt	45.79	58.13	30.1	23.79	28.46	54.71	56.57	43.02	65.89
Hartsfield Atl. Int'l Arpt.	44.08	22.09	29.9	23.28	19.98	24.26	23.88	31.80	33.06
Lambert St. Louis Int'l Arpt	25.24	23.93	14.96	19.54	22.72	53.87	34.04	30.48	31.70
Boston Logan Int'l Arpt.	32.36	32.84	34.61	39.23	29.79	22.15	26.37	25.19	31.84
Chi. O'Hare Int'l Arpt.	64.61	47.94	45.40	47.49	26.83	30.93	34.36	23.52	32.07
N.Y. JFK Int'l Arpt.	68.33	41.67	41.23	35.68	35.79	17.38	29.53	18.32	36.28
Los Angeles Int'l Arpt.	7.11	14.80	19.75	9.15	10.96	27.03	24.13	17.69	9.73
Philadelphia Int'l Arpt.	35.44	16.87	18.47	18.75	20.85	6.89	17.95	16.23	24.58

Table 8
FAA Statistics¹⁹
Operations with Delays of 15 Minutes or More

<u>Boston Logan Int'l Airport</u>	<u>Percent of Total</u>		<u>Percent of Total</u>	
	<u>CY98</u>	<u>Operations</u>	<u>CY97</u>	<u>Operations</u>
Equipment	388	2.3 %	382	3.1 %
Volume	273	1.7 %	310	2.5 %
Weather	14,657	89.4 %	10,849	86.8 %
Runway	127	0.8 %	280	2.2 %
Other	955	5.8 %	679	5.4 %
Total	16,400	100.0 %	12,500	100.0 %
Total Activity	515,119		497,097	
Delays per 100,000 operations	3,183.7		2,514.5	

¹⁷ FAA, ASC-1, 1998 Aviation Capacity Enhancement Plan, Information from CY93-CY97.

¹⁸ FAA Air Traffic Operations Managements System - OPSNET for the 55 Select Airports Calendar Year Comparison.

¹⁹ FAA Air Traffic Operations Managements System - OPSNET for the 55 Select Airports Calendar Year Comparison.

FAA calculated and reported delay at Logan has decreased almost 19% between 1993 and 1998. This information is not in DEIS/DEIR. This reduction in delay has occurred without the implementation of any of the airside improvements proposed in the DEIS/DEIR.

85.193

Also the DEIS/DEIR indicates that FAA identifies a 20,000 annual hour threshold for identifying delay problems at airports. In 1997, delay hours measured by FAA were 25,190 hours. The DEIS/DEIR indicates that Logan's delay is six times the FAA's threshold; however, this analysis is flawed since the 121,000 hours of delay are measured by a different method than FAA's measurement. Again, Massport chose to portray the information in a misleading way

85.194

The DEIS/DEIR indicates that the FAA ATOMS method understates total delay since delays of less than 15 minutes are not recorded. However, the DELAYSIM, the model used for the Logan Airside Planning Project, overestimates the amount of delay hours.

85.195

Over scheduling of capacity is also a by-product of airline marketing tactics. Should over scheduling of Logan's capacity occur, resultant delays would be compounded by and become more evident when wind and weather conditions add to the delay impact. There is no configuration available at any airport that can handle such a situation without delays. Until airline marketing personnel change their mind set, delays are inevitable. Even airports with three sets of parallel runways incur delays brought about by over scheduling. It is important to note that although this over scheduling is given as a scenario, airline schedules are now such that in no hour is the normal three runway capacity at Boston Logan airport exceeded by scheduled flights.

F.3 Cost of Delay

Cost of Delay is a subjective term. Massport exaggerates the cost of delay to airport users (airlines) and airport passengers. First, the DELAYSIM model overestimates delay hours by counting cancelled flights (where costs would not be minimized from other delays).

85.196

For airline passengers, the DELAYSIM model calculates ail delay. Airline schedules take into account typical delay times when publishing departure and arrival information. Thus, airline passengers idea of delay (according to the OAG data) is different and substantially less than assumed by Massport using DELAYSIM delay hours. Moreover, the travelling public accepts some delay time when using air travel. The delay to an airline passenger is time over and above the acceptable delay measuring stick. Massport also assumes that all passengers can be represented by a single "representative passenger" when economically there are different economic values for business versus pleasure travellers.

85.197

The document quotes a value of \$ 27 per hour of time from the 1997 APO Bulletin; however this document further details categories for personal and business travel as well as a low and high sensitivity range for each category. The generalized use of \$27 per passenger overestimates the value of delay for airline passengers at Logan.

85.198

Massport did not present the cost of delay information in any meetings with the CAC or its consultants. In fact, they indicated cost information would not be provided except the initial construction cost of the project.

85.199

Massport overestimates the costs to airlines and passengers. Information should not be reflected unless a more detailed cost-benefit analysis is conducted. Massport presents only costs to airlines and their passengers. If cost information is to be presented as part of the analysis process for the DEIS/DEIR, a full cost-benefit analysis should be provided. Providing only part of the story is misleading.

85.200

As stated in 40 CFR Part 1502 Environmental Impact Statements regarding cost-benefit analysis²⁰: "If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed actions, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences. To assess the adequacy of compliance with sec. 102(2)(B) of the Act the statement shall, when a cost-benefit analysis is prepared, discuss the relationship between that analysis and any analysis of unquantified environmental impacts, values, and amenities. For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. In any event, an environmental impact statement should at least indicate those considerations, including factors not related to environmental quality, which are likely to be relevant and important to a decision."

F.4 Aircraft Delay and Runway Use Results

The Airside Improvements Feasibility Study (dated July 1995) addressed the anticipated level of flight delays if no measures were enacted to improve operating efficiency. The DEIS/DEIR indicates that "1998 delays are less than those experienced in 1993." Thus, the selection and justification of 1993 as the base year for the development of an DEIS/DEIR report (dated February 1999) is inappropriate based on a) existing conditions and b) results of prior studies. It is inconceivable that an airport delay analysis presented in 1999 would use a base year that is five years old. Massport chose to delay submittal of the DEIS/DEIR until early 1999, and should be required to provide analyses that are appropriate to forecasting techniques based on recent (not five year old data). Massport is presenting information based on five year

85.201

85.202

²⁰ Council on Environmental Quality, 40 CFR Part 1502.23

old data and analyzing the results for only a ten year period in the future. This is not an acceptable approach to the delay analysis.

Moreover, the DEIS/DEIR indicates that analysis was provided for the base year; yet Table 4.5-1 does not indicate the total delay hours for 1993 for the five forecast scenarios for each of the proposed Logan Airside Improvement Packages. The statement that "1998 delays are less than those experienced in 1993" points up the flaws with the forecasting of delay using the methodology and approach presented in the DEIS/DEIR. (Note: Table 4.5-1 does not label the Alt. 1 vs Alt 4 & Alt. 1A vs. Alt 4 as delay reduction.)

85.203

85.204

F.4.a Total Delays

The document compares the FAA delay threshold to Massport's model and indicates that FAA's threshold is to be exceeded by eight times. This comparison is inappropriate since the measures of delay are not the same (FAA's definition of delay is significantly different than Massport's model). This statement misleads the reader to think that FAA's threshold is being exceed by a factor of eight when, in fact FAA only counts delay hours over 15 minutes and Massport's model counts every minute of delay.

85.205

Again, in this section the DEIS/DEIR puts a value on the delay savings that is inappropriate and inaccurate. An interesting comparison should be noted:

85.206

1993 Base Year	159,000 modeled delay hours
1999 29M Low	157,500 modeled delay hours
Delay Reduction:	almost 1 %
No Action:	almost 1%

F.4.b Runway Related Delays

The DEIS/DEIR states that implementation of Alternative 1 or 1A will substantially reduce the growth in delays occurring in VFR conditions. It should be noted that the key points presented in Chapter 1 (point 5) indicate the "principal cause of delay at Logan is the substantial drop in airfield capacity that occurs when wind and weather conditions force controllers to utilize configurations with fewer than three runways or when poor weather requires increased separation distances between aircraft." These conditions occur during IFR conditions, thus the implementation of Alternative 1 or 1A is not just providing reduction in weather related delay but is providing additional capacity during VFR conditions. While the peak hour capacity does not increase with construction of the runway, the additional runway will provide the controllers the option to use higher-capacity configuration more of the time. This ability is providing additional "through-put" of aircraft operations.

85.207

The guise of constructing the new runway to reduce weather related delays actually has the effect of increasing the all weather capacity of the airport; thus allowing for additional through-put of aircraft operations than without the new runway. If as the DEIS/DEIR states, there are delay savings realized by this delay reduction, then there is also a stimulation of air travel demand (caused by the market forces of lowering prices). This stimulation is not reflected in the annual hours of delay calculations.

85.208

F.4.c Taxiway-Related Delay

The DEIS/DEIR puts a value on the delay savings that is inappropriate and inaccurate. Please see comments under "Cost of Delay."

F.4.d Runway Use

Figure 4.5-3 Distribution of Jet Aircraft Operations by Operating Direction illustrates 1997 actual data. 1997 is not the base year.

85.209

The discussion of runway use fails to highlight that it is FAA controllers who make the decisions regarding the runway configuration that is selected. The DEIS/DEIR assumes that FAA controllers would select the a) highest capacity configuration b) meeting of PRAS goals. This assumption has not been historically proved to be true.

85.210

The section "Revised Wake-Vortex Turbulence Rules" implies that the "new" wake turbulence rules require one aircraft to follow the other at the stated distances. These rules are applicable only to Air Traffic Controllers for providing required spacings between aircraft for following and crossing traffic. The distances behind large and heavy aircraft are those that air traffic will use to provide initial separation until other separations, such as visual separation, can be applied. These rules are not applicable to a pilot who chooses to follow another aircraft visually. This information is verified through the FAR 91 Flight Rules, appropriate advisory circulars, and the Air Traffic Control Handbook, 7110.65L and revisions. A prudent pilot, when operating in VFR conditions behind a larger or heavy aircraft, will adjust his path behind the aircraft to ensure a safe flight.

85.211

F.5 Delay Conclusion

Page 4-41 describes 1998 annual delay as 143,000 hours where as Page 1-12 describes 1998 annual delay as 128,000 hours. These are modeled hours, a product of "DELAYSIM", not measured hour or "FAA" hours.

85.212

The use of 1998 data rather than 1993 data strengthens the argument that the "base Year" must be revised.

85.213

According to the FAA, operations delayed over 15 minutes in 1998 totalled 16,400²¹. At a minimum this would be 16,400 operations @ 15 minutes / 60 minutes per hour or 4,100 total delay hours. At a maximum, assuming that delays over five hours are canceled, the annual delay would be 16,400 operations @ 5 hours or 82,000 total delay hours. Now, obviously, this is a simplistic method of applying the FAA reported data since all of reported delays are over 15 minutes (since it is the minimum threshold for reporting) and not all the reported delays will be five hours. However, using this basic approach, delay hours would be between 4,100 hours and 82,000 hours. These figures are substantially lower than the DELAYSIM model and bring into question the validity of the methodology and approach.

85.214

²¹ FAA Air Traffic Operations Managements System - OPSNET for the 55 Select Airports Calendar Year Comparison.

G. Alternatives

Massport has not met the requirements of the 40 CFR Part 1502 Environmental Impact Statements regarding "alternatives including the proposed action" for this DEIS/DEIR which require²²: "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated" and "Include reasonable not within the jurisdiction of the lead agency."

No discussion of alternatives not considered in this DEIS/DEIR was included. A reasonable person could expect alternatives to include the following:

- a. Development of a new airport to accommodate demand and reduce delays at Logan 85.215
- b. Consideration of Implementing a High-Density Rule (Slots) to control congestion at Logan. " In order to avoid excessive congestion at several of the nation's airports, access is capped through regulations which establish a fixed number of landing and takeoff rights ("slots")."²³ 85.216
- c. Consider Implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions for Stage 2 and Stage 3 operations at Logan to provide noise relief to affected communities. A specific measure that could be considered is a cap on night-time operations. 85.217
- d. Diversion of general aviation traffic and origin/destination traffic of both regional non-jet and short-haul jet traffic to Massport's Hanscom Field. 85.218

At the present time, Massport presents only a limited suite of measures that could be effective in addressing this issue. The general approaches that could be implemented that have not been forestalled by other actions, and are not mutually exclusive are discussed below. However, the political will has not been demonstrated for the required combination of a level of commitment and of supporting measures sufficient to prevent the growth of aircraft impact at and around Logan Airport.

G.1 Regional Airports

Diversion of passengers to other airports has major potential to absorb current and future growth in air travel demand of the Boston Metropolitan and eastern New England areas. Hanscom Field, T. F. Green, Manchester, Worcester and potentially Pease, are the candidate facilities. Massport has made an effort to evaluate the potential for such diversion, and some of the recent growth in travel through those airports has certainly been from passengers who could and would otherwise have

²² Council on Environmental Quality, 40 CFR Part 1502.14

²³ FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", e-4 "Regulatory Changes in Capacity at Access Capped Airports", page 3-22.

utilized Logan. However, those airports do not now offer the full suite of services and destinations available to and from Logan. Without additional support and stimulation it is unlikely they will. Therefore, if market forces are left to drive growth in traffic at those airports, growth at Logan will not be significantly constrained. Specific goals would have to be established, and a series of measures implemented to stimulate shift of traffic demand from Logan.

Hanscom Field is owned and operated by Massport. We believe it has significant potential to absorb passenger traffic that does not seek connections to other flights, i.e., Origin & Destination traffic to and from the Boston Metropolitan area. Many "General Aviation" corporate flights, and some "Regional Non-jet" and "short-haul" jet traffic could find Hanscom an attractive alternative to Logan if appropriate services and facilities were provided and a marketing campaign implemented. Hanscom has the capacity to handle an additional 40-50,000 operations annually, even if current operations including 'touch and go' are not modified.

85.219

The only mention of a Second Major Airport in the DEIS/DEIR is the information presented on the 1991 MAC Second Major Airport Siting Study. This study which concluded that it would take at least 10 years of planning from site selection to construction indicated it was not a solution for the next decade and a half. Logan's airside improvements are to be implemented, if on the schedule presented, by the beginning of 2005. Does not the very conclusion of the Second Major Airport study point out that long term considerations to meet increasing demand require that a second airport (either a greenfield airport and/or significant expansion of an existing airport) be an alternative to the improvements recommended?

85.220

Per 40 CFR Part 1502 Environmental Impact Statements regarding alternatives including the proposed action: "In this section: Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. Include reasonable not within the jurisdiction of the lead agency."²⁴

The ENF Certificate dated November 22, 1999 cited that the alternatives analysis must be broadened to include off-airport alternatives²⁵. Although Massport includes some options off-airport, the development of another air carrier airport has not been reasonably discussed nor have the reasons for its elimination as an option.

85.221

The fact that Massport does not provide long-term planning forecasts (at least 20 years from submission of DEIS/DEIR) teamed with its inability to provide as an

²⁴ Council on Environmental Quality, 40 CFR Part 1502.14

²⁵ ENF Certificate dated November 22, 1995, page 3, last line of alternatives section.

option the development of a second airport highlights the short-sightedness of the long term development.

85.222

Per 40 CFR Part 1502 Environmental Impact Statements regarding purpose requires that ²⁶: " . . . It shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." In the case of many of the close-in neighborhoods, the option for a second airport is reasonable to minimize adverse impacts on their quality of life.

The presentation of the potential diversion of Logan passengers due the alternatives of regional airport use, rail use and video and online conference use are indicated to be the same at a 45M forecast level and a 37.5M forecast level. It is unclear why if almost 20% of passengers would use these alternate modes at 37.5M demand level, why at a higher passenger demand level, more passengers would be diverted to these alternate modes at a 45M forecast level.

85.223

One of the assumptions regarding the recapture rate from the analysis described in Table 2.4-4 is that the estimated service area of the alternate airports remains the same in 2010 as it is in 1994. This is not an accurate assumption since the service areas for each of these airports will grow significantly as they improve air service routes and frequencies. Massport fails to list Hanscom Airport as a potential diversion airport.

85.224

Massport projects a relatively small potential for shifts of transportation and communication demand away from Logan Airport as a result of use of high-speed rail, other regional airports, and telecommunications. These shifts do not, according to Massport, come anywhere near absorbing the projected growth in passenger demand.

85.225

The Massport Logan Community Advisory Committee (CAC) argues that the incursions of Massport and Logan upon the communities must be rolled back. This can only be accomplished by deterring air traffic growth at Logan Airport. This is a regional problem demanding of regional solutions. While Massport has taken preliminary steps in this direction, the overall effort and the present potential are seriously inadequate. The New England governors, the FAA, and the Federal Highway Administration must assist state government and the Boston Area communities in devising and implementing programs to ensure that Massport's numbers grow no larger, while not inhibiting normal beneficial economic growth of Eastern New England. The Airside Improvement Project must be viewed in this larger regional context. It is not just a set of projects designed to reduce airside delays and improve safety.

85.226

²⁶ Council on Environmental Quality, 40 CFR Part 1502.1

G.2 Peak Hour Pricing

Congestion pricing, peak-period pricing and techniques that base landing fees on functional categories relating to operations (landing or take-offs, weight (or size) of aircraft, and capacity to meet peak period demand could be particularly useful in reducing delays. The basic assumption was made that peak period pricing needed to be revenue neutral, pertaining only to airfield revenue and airfield costs at Logan. This assumption resulted in impacts to airlines that operate small aircraft only. Should airfield costs to develop capacity enhancement supporting Logan (i.e., an alternate airport) be allowed, then the results would have an effect on larger aircraft and the results would provide additional delay reduction.

85.227

A properly-designed and implemented form of congestion pricing, among the alternatives under consideration, will afford a great degree of delay reduction at Logan, for a given investment. Massport's previous experience with regulatory challenges in implementing a demand management technique has affected the assumptions of the model developed.

85.228

Consideration should be given to a quite different approach to addressing the efficiency of Logan Airport during peak operating periods and in carrying out its primary mission. In a simple form, the mission of the airport might be defined as "the accommodation of as many passengers as feasible under existing conditions with a minimum of delay" with some stated commitments to minimizing impacts of operations. The measure of efficiency presently used by Massport and the FAA relates to numbers of aircraft operations handled in specific periods (i.e., per hour); and the hours of delay experienced in handling those operations. Massport's efforts have focused on operational and facility expansion approaches to increase the capacity for total aircraft operations under restrictive conditions. *Refer to Appendix C for additional discussion of alternative approaches to peak hour pricing.*

85.229

If the aircraft passenger is identified as the "unit of concern" in the airport's primary mission, the fundamental measure of efficiency and the principal objective of the airport would be to maximize the number of passengers transiting the airfield per hour. If maximizing the throughput of passengers was the dominant objective of the management and operation of the airport facilities under the control of Massport, the measures considered might differ from the current models.

One approach might be to use the hourly integral of aircraft type/seat capacity adjusted by the current or projected average load factor for each aircraft type and operator or route. To maximize facility efficiency and to provide the maximum feasible throughput of passengers during critical periods, Massport could through defined mechanisms encourage or give preference to the use of its facilities under its control (i.e., gates, hold rooms, terminals) during critical periods by aircraft and

operators providing service to the greatest number of passengers. Massport would apply this approach through lease terms and operating agreements with its lessees and aircraft operators.

85.230

Massport's model for peak hour pricing has chosen too narrow a definition of the regulatory criteria it must meet to establish a peak hour pricing structure. It also has chosen a higher operational threshold (115 operations) which underestimates the delay reduction capabilities of peak hour pricing.

85.231

Massport chose varying data information, both 1993 and 1995 flight schedules, for modeling the peak hour pricing simulations. Massport has again, chosen the input of information which will provide the output it expects.

85.232

The option of utilizing "costing" (including peak period pricing) approaches for the purpose of delay reduction should be retained. It should be the first option selected for implementation, as a non-capital intensive, adjustable measure to move toward a goal.

85.233

G.3 Other Alternatives

A shift away from air travel through reliance on other means of travel or communication is essential. Vigorous measures to foster and encourage this shift should be undertaken by State government in cooperation with Amtrak and telecommunications providers.

85.234

High-speed rail in the Northeast Corridor and telecommunications as a substitute for business travel is briefly explored in the DEIS/DEIR. Should energy cost and availability become a much more significant factor in the cost of air travel, these measures would become increasingly attractive and effective to divert Logan passenger load. Neither is effective in absorbing vacation travel demand, which particularly contributes to peak-period loading.

Massport has worked to reduce automobile travel to and from Logan Airport by providing and encouraging use of short-range mass transport. Rail and bus transportation could also replace some of the short-haul feeder/distributor traffic at Logan. Much of this traffic in smaller aircraft is the most likely to be squeezed out as economic measures are applied to address future congestion at the airport. Furthermore, these smaller aircraft do not create significant community impacts. Their presence and operations are primarily a concern to Massport and the airlines as a significant factor in airfield and air space congestion and as a factor in creating equity of access among passengers.

H. Benefit-Cost Analysis

The development of the preferred alternative is anticipated to cost over \$60 million (presumably in 1998 dollars although this information is not provided in Table 6.7-2) plus planning, engineering, and resident inspection fees likely adding at least an additional 30% to the construction for a total project cost of around \$80 million. No indication of how the project is to be financed is provided in the DEIS/DEIR document. This information should be discussed as it may be relevant to the alternative selection.

85.235

FAA legislation requires that airport sponsors conduct a benefit-cost analysis for capacity-related airport projects, particularly when the sponsor anticipates the need for \$5 million or more in Airport Improvement Program discretionary grants, or any capacity project for which an letter on intent is sought.²⁷ Table 8.8-1 does not include the benefit-cost analysis as part of the anticipated permits and approvals required by the FAA. This is obviously a critical oversight since the valuation of both benefits and costs including dis-benefits to affect communities that provide the economic justification of this project is also missing from the DEIS/DEIR.

85.236

Massport indicates there are environmental benefits with implementation of the various alternatives. However, there is no economic analysis of the noise impacts regarding the various alternatives. Massport should be required to identify the specific dis-benefits for the various alternatives proposed as stated in the following FAA-APO document²⁸: "Noise Reduction - The provision of air transportation services generates noise which imposes costs or dis-benefits on those who are subjected to this noise. Government investments which promote aviation may have the accompanying effect of increasing aircraft noise. Government activities have been undertaken to reduce aircraft-generated noise. The benefits of noise mitigation activities are the reductions in noise-produced costs which the activities achieve. These noise related costs and benefits should be addressed in economic analyses of activities which result in increases or decreases in aircraft noise. Although it is possible to establish a conceptual framework which correctly measures the social cost of aircraft noise, deriving empirical estimates for such a framework is a difficult undertaking requiring numerous assumptions and estimation compromises."

85.237

²⁷ FAA, Office of Aviation Policy and Plans "FAA Airport Benefit-Cost Analysis Guidance", June, 1997, page

1.

²⁸ FAA-APO-98-4, "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 3, "Benefit Estimation", e-1 "Noise Reduction", page 3-20.

I. Airfield Layout & Utilization

I.1 R/W 14/32 Layout Options

The selected preferred layout option for "unidirectional" Runway 14/32 is Option C. (See page 3-28.) Option C is a 5,000-foot runway shifted slightly to the southeast along the centerline so that a small portion of the approach runway safety area is over water (rather than filling or creating a deck (Option B)). This will require a "Modification of Conditions" by the FAA. The discussion of this as a feasible option did not include a discussion of aborted takeoffs in the 14 direction, and whether the reduced safety overrun would be approvable under that scenario. If the runway cannot be so shifted, Option A or a shorter runway would be the only viable option. Option A has a significant impact on Hyatt parking, as it would require a substantial reduction in that parking for which there appears to be no alternative. If this project is to proceed to the Final EIS/EIR stage, there should be a determination by FAA that Option C will be permitted.

85.238

The DEIS/DEIR refers to a crosswind being a determining factor in runway availability. A statement is made (on Page 3-7) that "... runways at Logan are only available if there is a tailwind of less than seven knots and a crosswind of less than 20 knots." This statement is inaccurate since the criteria is "a crosswind component of 20 knots" as the determining factor. A wind at a 45 degree angle across a runway at approximately 30 knots can equate to approximately an 18 knot crosswind. Other contributing causes to a crosswind being a factor for runway selection are airline regulations, pilot proficiency and preferences, and aircraft types and capabilities.

85.239

I.2 Taxiway Improvements

The summary of advantages cited for the Centerfield Taxiway (page 3-29) supports the community concern that the presence of the Centerfield Taxiway will make the use of the 4/22 runway combinations more attractive and therefore will tend to strengthen the bias of the tower toward use of those runways. Not only would this operate contrary to the goal of shifting operations from those runways, it would increase the tendency to stack aircraft in the northern section of the airfield.

85.240

I.3 Modifications to Standards

The preferred alternative recommendation does not state which runway option is being recommended. If as page 3-28 indicates, Option C is the preferred layout option for the runway, then it is critical to note that this option would require a modification to standard from the FAA regarding the runway safety area.

85.241

The discussion of Option C does not evaluate the potential of declared distances or displaced thresholds in lieu of requesting a modification to standard. Option C would require a modification to standards for:

- * Penetration of FAR Part 77 for Harborside Drive
- * Penetration of FAR Part 77 Transition Surface for Hyatt and Buildings 56&57
- * Part of the Runway Safety Area is over the water

85.242

I.4 Aircraft Type Proposed to Use Runway 14-32

In Section 3.2.2.4 (page 3-24), there is a very brief discussion of the type and size of aircraft that will typically use the proposed new runway compared to the aircraft of maximum size that could use the runway. The aircraft mix projected to use Runway 14/32 that was used in the noise analyses should be stated, and justified. If the mix so used excludes certain aircraft based on landing or takeoff requirements this should be stated. If the mix so used includes a lesser proportion of certain other aircraft than does the Logan fleet mix this should be stated and justified.

85.243

The justification on Page 3-24, that only regional and commuter aircraft will use the runway is not consistent with the Airport Design Category (ARC) selected for the Runway which is C-III²⁹. C-III aircraft³⁰ include the following:

85.244

- * Airbus A-320-1000
- * BAC 111-200, -300, -400 & -475
- * Boeing 727-100 & -200
- * Boeing 737-100, -200, -300, -400 & -500
- * Fokker F-28-3000 & -4000
- * MDC DC-9-10, -15, -20, -30, -40 & -50
- * MDC DC-9-80 & -82

I.5 Procedures

Page 3-12 indicates that the approach procedure is to be a non-precision approach for proposed Runway 14/32. However, page 3-14 indicates that future use of a Global Positioning System could require a 1,000 ft wide primary surface. This 1,000 ft primary surface would be required for a precision instrument approach. Page 3-24 indicates that NAVAIDS for Runway 32 will consist of a localizer and glide slope for precision guidance. This is in direct conflict with the statement on Page 3-12 indicating a non-precision approach. It appears that Massport is presenting the

²⁹ DEIS/DEIR, Page 3-11

³⁰ FAA Advisory Circular 150/5300-13CHG4, Appendix 13

proposed runway as a non-precision runway used only by commuter aircraft. However, it is obvious that long-range plans include precision instrument capabilities and operations by a variety of large jet aircraft.

The DEIS/DEIR should clarify both the short and long term NAVAIDS being considered for the proposed runway. Deviations to standard should be included for the long term NAVAIDS with precision instrument capabilities (either ILS or GPS equipment) to illustrate the long term implication of the runway. As stated in 40 CFR Part 1502 Environmental Impact Statements regarding unavailable information³¹: "If the information relevant to adverse impacts is essential to a reasoned choice among alternatives and is not known and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement." This information should be easily attainable by Massport.

I.6 Uni-directional Runway

Under the Supreme Court decision in *Griggs v. Allegheny County*, 369 U.S. 84 (1962), proprietors of the airport are liable for aircraft noise damages resulting from operations from their airport since they planned the location of the airport and the direction and length of the runways. Because they are liable for airport noise as proprietors, airport owners have limited authority to determine the "permissible level of noise" of aircraft operations under their proprietary powers. Airport owners may not use this limited authority to interfere with Federal responsibilities for flight safety and efficiency. Thus, Massport cannot, as proprietor of the airport, ensure that proposed Runway 14-32 will be uni-directional. It is also important to note that they can, however, determine the "permissible level of noise" of aircraft operations.

I.7 Future Use

Although Massport states that Runway 14/32 will be built with a non-precision approach, their discussion shows that there may be the possibility of making this a precision approach. Massport further states that Runway 14/32 is to be equipped with an ILS localizer and glide slope for instrument approaches. The approach will be considered a non-precision approach due to higher weather minima for use of this runway.

The proposed approach is to follow the precision guidance until approximately 450 feet above the airport and then proceed visually to the runway. This altitude would be reached approximately one and one half miles from the runway. The approach for this runway is proposed to be similar to those for Runway 22L and Runway 27. To change this non-precision approach to a precision approach would require three

³¹ Council on Environmental Quality, 40 CFR Part 1502.22

events, of which two are physical changes. One would require the modification of the runway to medium or high intensity lighting, the second construction of approach lights for Runway 32, and the third an EIS by the FAA to lower the minima on this runway.

While precision approaches are not feasible for runways 22L and 27, they might be feasible for runway 32 with construction of a light pier similar to that on Runway 33L. If that were done, the runway combinations of arrivals on Runways 33L and 32, with departures on Runway 27, would become the highest capacity combination under IFR conditions.

85.247

J. Preferred Alternative

J.1 Key Points

The delay hours projected by Massport are the artifacts of its own model, and do not comport with the FAA's procedure for calculating delay at airports. In addition to calculating every minute of delay associated with every scheduled flight, it fails to take into account normal flight cancellation activities by airlines. Additionally, the FAA calculation and tabulation of delays at Logan over the last five years shows little change either year to year or as a trend.

85.248

The rejection of peak period pricing by Massport ignores two factors: First, that the construction project itself may increase delays marginally during the five-year construction period, although Massport pledges to avoid that effect. Second, that by the time the project is fully implemented, any delay-reduction benefits it may afford will be overcome by the projected growth in air travel operations, and conditions will be no better than now. The peak period pricing option should be implemented immediately to gain its delay-reduction benefits throughout and beyond the construction period. Massport appears reluctant to adopt a program that could adversely impact Cape Air, but we believe legal ways can be found to avoid that impact.

85.249

Layout Option C for Runway 14/32 requires the FAA to issue a "Modification of Standards." Should the FAA decline to do that, the possibility of constructing the runway, and/or the environmental impacts of constructing the runway, may change. These eventualities are not thoroughly explored in the DEIS/DEIR.

85.250

We believe there are adverse air quality impacts associated with construction of Runway 14/32 and the Centerfield Taxiway.

85.251

Residential "sound-proofing" does not fully mitigate the impacts of the increased overflights noise that would result from implementation of Alternative 1 or Alternative 1A, especially in the East Boston/Chelsea/Everett flight corridor.

85.252

The reduction in ground noise impacts claimed for Alternative 1 or Alternative 1A are almost entirely associated with a projected reduction of use of Runways 4/22. As pointed out elsewhere in this report, that benefit is likely to be short-lived, as traffic grows and the FAA controllers respond to their primary imperative of maintaining airport capacity. Further, the Centerfield Taxiway is intended to improve the performance of those runways, suggesting they are likely to continue as the primary runways.

85.253

A major element of the proposal to mitigate impacts on the state-listed upland sandpiper, that of creation of a replacement habitat on Cape Cod, appears to ignore geography and is of questionable benefit.

85.254

As stated above, we disagree with the recommendation to defer implementation of peak-period pricing. In fact, Massport does not commit to future implementation of peak-period pricing, should and when delay becomes a significant problem in its judgment.

85.255

The commitment to maintain Runway 14/32 as a unidirectional runway is clearly reversible. That, and the signal this project sends that Massport continues to be committed to expansion of Logan Airport, are the two greatest concerns of the surrounding communities.

85.256

85.257

J.2 Other Comments

Massport is not including Alternate 1 as the preferred alternative which according to its own models provides the highest reduction in delay. Massport states that because of current conditions, peak hour pricing is not included but is an administrative option that they can later implement.

Because of the controversial nature of the peak hour pricing concept, Massport has recommended an alternative that does not include it. The selection of the preferred alternative responds solely to the current conditions and points out Massport's continued blindness to the long-term demand and capacity issues.

85.258

Alternate No. 3 provides delay reduction without the build option. Alternate No. 2 provides significant delay reduction allowing maximization of existing airfield capacity through the construction of a parallel taxiway. These two alternatives appear to be the most viable for the community.

85.259

According to 40 CFR Part 1502 Environmental Impact Statements regarding environmental consequences³², the DEIS/DEIR must address the environmental consequences regarding the following "The discussion will include the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. It shall include discussions of: (g) Urban quality, historic and cultural resources, and the design of the built environment . . ." The DEIS/DEIR discusses the preferred alternatives effect on historic districts but does not comment on the urban quality, or the design of the built environment.

85.260

Massport and the FAA state "when dealing with an existing airport (such as Logan Airport) within an urban setting (such as metropolitan Boston), any change in operating conditions aimed at more equitably distributing noise impacts (here, in accordance with the PRAS goals) may result in some increase in noise at specific historic areas while at the same time decreasing noise at other historic areas."³³

We state that changes to Logan's operating conditions are not more important than the cultural, historical and urban quality of life in the metropolitan Boston community. The external costs ("costs which third parties are involuntarily forced to bear as a consequence of the undertaking of an action by others"³⁴) that the preferred alternative would impose on the Logan communities are substantial. These costs have not been adequately assessed in the DEIS/DEIR. Noise impacts on historic sites are but one example that was not adequately evaluated in the draft document. The long-term prospects are for further worsening the "quality of life" situation in the community.

85.261

85.262

³² Council on Environmental Quality, 40 CFR Part 1502.16

³³ DEIS/DEIR Section 8.6.1.2 "Assessment of Impact"

³⁴ FAA-APO-98-4. "Economic Analysis of Investment and Regulatory Decisions -- Revised Guide", Chapter 4, "Cost Estimation", Section II.D, page 4-2.

Appendix A

Draft White Paper on
"Alternatives to Reduce Delay at Boston Logan Airport"
prepared by Consultants to CAC
dated June 13, 1996

*****Draft*****

White Paper

on

Alternatives to Reduce Delay at Boston Logan Airport

Prepared for:

Citizens Advisory Committee (CAC)

Prepared by:

Consultants to CAC

Consultants include:

Jerry Bogan

Monty Gettys, Montgomery Consulting Group, Inc.

David Standley, P.E.

Prepared on:

June 13, 1996

Alternatives to Reduce Delay at Boston Logan Airport

Background

This paper discusses several alternatives to reduce the current and forecasted aircraft delay at Boston Logan Airport. In considering alternatives for delay management and reduction at Boston Logan Airport, a multitude of options may be considered including those that are dependent on:

- airside development and expansion,
- improvements to air navigation equipment,
- intercity/corridor transport ground transportation alternatives,
- improvements in communication industry,
- using and expanding under-utilized airports,
- improvements in airspace and approach/departure management and procedures, and
- demand management policies.

Addressing the Logan delay problem has long been the subject of various analysis. While most agree that a solution for airport capacity and delay problems must be beneficial for the majority, those named parties typically include the FAA, the airlines, the airports, and the traveling public, rarely the general public, the neighbors of the airport and the communities surrounding the airport.

Some of the alternatives proposed in this report may be implemented within a short-term time period. However, most of the proposed options require significant time for development and implementation. This fact alone supports immediate action to seriously pursue these alternatives to reduce delay at Boston Logan.

Delay at an airport is caused by various reasons. The FAA groups delay causes into various categories¹ including delay due to:

- * weather,
- * airport capacity of the landside (ability of the terminal to accommodate the passengers, meeters, and greeters in the terminal facilities including ticket counters, gates, and baggage handling facilities),
- * airport capacity of the airside (ability of the physical layout of airfield to accommodate the aircraft based on aircraft mix, wind, weather, airspace control, and operational control),
- * volume of traffic compared to the ability of air traffic controller to handle it,
- * closed airfield pavements including down-time for maintenance or construction,
- * availability or non-performance of navigational equipment, and
- * other reasons.

Adverse weather conditions are the principal uncontrollable factor intermittently reducing the achievable capacity of the airfield to a value below its theoretical physical capacity. Over-scheduling, shifting of scheduled operations from earlier periods because of prior delays or delays elsewhere, and unscheduled operations, can all result in circumstances where demand exceeds available capacity even in the absence of adverse weather. These and the other listed factors may all contribute to the gap, known as delay, created when the demand for the airport is greater than the capacity available.

The FAA has lead recent efforts in addressing the delay problem at all heavily congested airports including Boston Logan Airport. **Exhibit 1** addresses various strategies considered by FAA to reduce the delay at Logan. The summary of the recommendations was developed as part of the "1993 Boston Logan Capacity Enhancement Plan".

¹ FAA, 1993 Aviation System Capacity Plan

Alternatives to Reduce Delay at Boston Logan Airport
Draft Document

Exhibit 1
Summary of Recommendations
Boston Logan Capacity Enhancement Plan

		Estimated Savings in Delay (000 hrs)			
		412,000	450,000	504,000	
Strategy	Alternative Description	ops/year	ops/year	ops/year	Status
Strategy A: Separation of Small and Jet Aircraft Operations					
A-1	New commuter Rwy 14/32, unidirectional	33.6	81.3	171.4	further study
A-2	New commuter Rwy 14/32, bi-directional	34.8	86.0	193.1	not recommended
A-3	Extend runway 15L/33R to 3,500 w/ new taxiway	34.9	85.0	179.4	further study
A-3a	Combine alternatives A1 and A3	34.0	84.4	178.4	not recommended
A-3b	Combine alternatives A2 and A3	34.4	85.1	181.9	not recommended
A/B-4	Removal of noise restrictions on arrivals on Rwy 22R	0.232	0.255	0.2	not recommended
A-5	400' extension of Rwy 9 for commuters to hold short of Rwy 15R	1.8	5.6	12.9	^
A-6/D-2	Application of MLS technology with new procedures		see narrative		^
A-7	Simultaneous parallel approaches to Rwy 33L circle to Rwy 4L	1.5	0.0	0.0	^
Strategy B: Expand The Number of Runways For Simultaneous Jet Operations					
B-1	East extension Rwy 27, hold short of Rwy 22L daylight, VFR	0.089	0.12	0.5	not recommended
B-2	Simultaneous approaches to Rwy 4R, 4L, 22R & 22L < VFR 1 cond's	15.1	30.0	30.2	^
B-3	Simultaneous IFR approaches to Rwy 27, 22L 4L & 33L	2.1	4.0	4.5	^
A/B-4	Removal of noise restrictions on Rwy 4 departures	0.332	0.255	0.6	not recommended
A/B-4a	Remove noise restrictions on Rwy 4L & extension to TwyB	0.2	0.2	0.6	not recommended
B-5	Side step approaches from Rwy 4R to Rwy 4L	1.6	0.7	0.0	further study
B-6	Unhaze fan headings for aircraft departing Rwy 22L & 22R	1.9	2.7	6.2	not recommended
B-7	Use of hold short procedures Rwy 15R, 22L, 33L	3.2	8.3	17.9	^
Strategy C: Improve Taxiway Circulation					
C-1	New parallel taxiway between Rwy 4L/22R & 4R/22L		see narrative		Massport is currently pursuing a comprehensive system analysis of the taxiway system using a simulation model to improve taxiway efficiency and reduce the potential for runway incursions
C-2	New south exit parallel taxiway for Rwy 27		see narrative		
C-3	Add fillets at intersection of Twys D and C with Rwy 15R/33L	0.061	0.104	0.156	
C-4	Staging areas for Rwy 15R/33L, 27, 4R, 22R and 33L/TwyG	0.75	0.83	1.6	
C-5	New taxiway from the end of Rwy 27 to the end of Rwy 33L				
C-6	Ex. end TwyD to Rwy 4R/22L		see narrative		
Strategy D: Lowering Approach Minimums					
D-1	Install CAT II/III ILS on Rwy 15R, 22L, 27 and 33L	1.1	1.3	1.7	^
A-6/D-2	Utilization of Microwave Landing Systems (MLS) technology		see narrative		^
D-3	Reduce min's to 250' & 3/4 mi on Rwy 22L for CAT I approaches		see narrative		^
Strategy E: Demand Management Policies					
E-1	Increase the % of large and heavy jets in the fleet mix	0.0	0.8	2.7	not recommended
E-2	Redistribute airline schedules within the hour	8.2	20.7	28.4	not recommended
Strategy F: Develop More Efficient Use of The Airspace					
F-1	Improve metering and spacing and segregate heavy jets	1.8	2.8	3.2	not recommended
F-2	Benefit of Vortex Advisory System	12.8	20.9	24.2	^
F-2a	Benefit of Wake Vortex Avoidance System	17.7	29.6	41.1	^

^ Will proceed toward implementation, unless otherwise noted

In the capacity enhancement plans for the most congested airports, the FAA evaluated how each individual airport could operate more efficiently for the air traveling public. The FAA did not consider nor were they asked to address the broader question that investigates how to economically, effectively, and efficiently move people from place to place.

As airports become more congested and individual airports can not keep pace with the demand, the answers to the capacity dilemma will need to consider using a full range of multi-modal transportation methods. The need to remedy the capacity problem is not being solved with the incremental addition of more airside and landside facilities. Additional construction has not and will not solve the problem.

Massport projects Logan's annual passenger demand is projected to grow from 24 million in 1993, to 29 million in 1999, and to the range of 37 to 45 million by 2010. Others^{2 3} have projected numbers in the low 30's by about 2010. Annual passenger loadings in even the mid-thirties likely exceed the effective capacity of the airfield. To address the ever-growing problem of delay by solely trying to increase airfield capacity by constructing additional pavement does not address the real issue of effectively and efficiently transporting people from place to place.

The air transport industry is a part of the overall transportation system. Solutions to reducing delays must be a part of the entire system; not just incremental construction of more runways at delayed airports. Shifting of a large portion of the airport passenger growth to other transportation modes, to under-utilized airports or to using new technology in communications is critical lest the demand chokes the existing system. This shifting is particularly relevant when the reduction is evaluated as

² Strategic Assessment Report, Arthur D. Little for Massachusetts Aeronautics Commission, 1993

³ "Does New England Need Another Airport?", Dawson, Michael, L.M. Dean, and J.R. Meyer, Harvard University, August 1995

part of a total delay reduction strategy for the entire air transportation system.

It is time to consider an approach to address capacity constraints other than by solely building more runways. It should be especially noted that the airlines and passengers voluntarily schedule more flights in given periods than the airport can handle without delays, and the airport (with the federal government) allows this scheduling practice to continue.⁴

The Logan Airside Feasibility Study indicates the current level of delay at Logan is about 80,000 total hours annually.⁵ Massport argues further that in 1999, with unidirectional runway 14/32 in operation, delay hours at Logan will be about 180,000 hours per year.⁶ A memo prepared by Massport's consultants⁷ which addresses cost of delay argues for a per-hour average cost of delay of about \$3,100 per aircraft hour. Therefore, Massport's projection of the current cost of delay would seem to be about \$250,000 annually, while the projection for the annual cost of delay at Logan in 1999, from Massport's figures, appears to be in the range of \$550,000,000, increased slightly if 14/32 were not built.

It appears, based on these numbers, that the air transportation system is now and will be imposing

⁴ Position Paper - Airport Capacity in the 1990s, Meeting the Challenge, Aviation Systems Research Corporation, April, 1992

⁵ Logan Airside Improvements Feasibility Study - Phase I Report, Massachusetts Port Authority, Jason M. Cortell and Associates, Inc., July 20, 1995, Table V-3

⁶ Logan Airside Improvements Feasibility Study - Phase 1 Report, Massachusetts Port Authority, Jason M. Cortell and Associates, Inc., July 20, 1995, Table V-17

⁷ Memorandum to Flavio Leo and Betty Desrosiers of Massport from David Holland of SH& E memo on May 18, 1996 referencing "Cost of Delay"

a cost each year on the Boston metro and New England area ranging from a quarter of a billion dollars (current) to over half a billion (near future) without counting the environmental, social, and other costs imposed on the area communities and residents. One might expect a significant concern with such costs. The somewhat surprising absence of a high level of complaint and of corrective actions suggests that as a whole society either does not perceive these "costs" or is inclined to accept and somehow compensate for them.

Such costs do justify major actions to control and reduce them. The actions which can be most useful in this regard are those which enhance and develop alternatives to air travel. An annual investment of a significant portion of these "delay costs" in the development and promotion of the several alternatives suggested would produce large dividends. Some of these would be appreciated in the short term while others, such as full high-speed rail service in the Northeast Corridor with ready access, major enhancements of regional airports, and replacement of many of the smaller aircraft would take much longer.

Of course, no one single entity or even a limited number of entities experiences these "costs". Seventy percent (\$390 million annually for 1999) of the "costs", previously referenced by Massport's consultants, will be borne by passengers; of whom about 30 million are expected in 1999 (not all delayed). By contrast, the airline industry bears a much smaller share, projected to amount to around \$ 150 million annually in 1999.

A part of the problem, therefore is how to support the costs of developing and implementing alternatives. Options might include additional "airport ticketing fees" levied on passengers, assessments against aircraft operators (in the form of increased and dedicated user fees), the proceeds of "congestion fees", and general or special levies not directly linked to the air transport system.

Another part is how to allocate such funds among the several alternative modes of communication and transport which could serve to ameliorate the delay situation. A third part is the control of the funds and their expenditures. By contrast, decisions concerning responsibility for collecting such funds are simple.

Massport is currently pursuing several options identified in the FAA's Boston Logan Capacity Enhancement Plan in the airside improvements planning project (including construction of a new commuter and jet uni-directional runway 14/32, a centerfield taxiway, other taxiway improvements, and administrative techniques). However, a review of the summary list from the Boston Logan Capacity Enhancement Plan may provide some insight into additional actions that may be considered by Massport in the future.

A real-life example of FAA acting on the airport delay problem is the history of the high density rule (HDR). About 28 years ago, FAA established restrictions on operations during peak hours at some of the nation's most congested airports. While this paper does not advocate the introduction of "slots" for Boston Logan, this historical action does point out that airport capacity constraints can result in substantial political actions besides construction and expansion. A brief history of the HDR and a summary of a comprehensive review of this rule will provide some insight to the concerns over airport capacity and delay.

High Density Rule¹

In 1968, the FAA established a regulation to address delay problems at five of the nation's busiest airports. The regulation, known as the High Density Rule (HDR) implemented in 1969 governed the

¹ Information on HDR Rule summarized from "A Report to Congress - A Study of the High Density Rule", USDOT, May 1995.

allocation of capacity at Chicago O'Hare, Washington National, New York area's: Kennedy, LaGuardia, and Newark airports (Newark was later exempted from the rule).

The HDR allocates capacity at these four airports by imposing limits on the number of operations during certain periods of the day. A single operation, commonly called a "slot," is authorized by the Department of Transportation under the FAA for air carrier, commuter, and other types of operations.

In 1968, rising flight demand, work slow-downs between FAA management and air traffic controllers, over-scheduling by the airlines, limited airport capacity and unlimited access by general aviation led to a determination by the air carriers, air travelers and the federal government that a short-term solution was needed to reduce congestion, thus the high density rule was implemented.

For each airport, the rule imposes limitations or quotas on the number of slots allocated per hour (or half hour) for three classes of users: Air carriers, scheduled air taxis (regional carriers and commuters), and other operators (general aviation, charter operators, military, and other nonscheduled operators).

After nearly 25 years in operation, a long term capacity solution was still not in-sight and the HDR rule was still in effect at these four airports. The rule has evolved to change with the aviation industry environment as a result of the introduction of wide-body and jumbo jets, airline deregulation, airline mergers and acquisitions, bilateral agreements, growth in international service, airline hubbing, and FAA flow control management.

In 1993, the National Commission to Ensure a Strong Competitive Airline Industry urged a review of the HDR rule and gave consideration of lifting the operational restrictions. The Report to

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Congress on "A Study of the High Density Rule" as a response to the Industry Commission reported⁹:

- * Changing the HDR will not affect air safety
- * While each of the four HDR airports has unique characteristics, eliminating or substantially changing the HDR is likely to result in an increase in the number of airport operations. These increased operations will carry both benefits and costs, including:
 - * Benefits to consumers in the form of new and expanded air services and reduction in air fares,
 - * Increase in revenue for each airport as a result of a larger number of operations,
 - * A reduction in airline profits when fare premium presently charged at 3 of 4 HDR airports is lost due to increased competition,
 - * An increase in travel delay time and costs -- for consumers and airlines -- due to increased "peaking" of demand in airport operations as users opt to fly at their most desired times, and
 - * A near-term increase in the size of the population affected by aircraft noises at each airport.

The report also noted that "if lifting the HDR precipitates significant travel delays, consumers, airlines, and the airports will be motivated to adjust their behavior in response to market forces, as happens at non-HDR airports across the U.S. Consumers, for instance, might elect to fly during "off-peak" hours, and airlines could modify their flight schedules to mitigate increased delay costs."

Relevant to Boston Logan is the discussion in the cited report on peaking, or as in the case of the HDR, changes in peaking. It was noted "increased peaking has important potential consequences for noise impacts, delays and economic benefits. If more operations are concentrated into shorter periods of time, perceived noise, and therefore noise impacts, increase.

Similarly, delays may be exacerbated by the concentration of operations in shorter time periods. At any given time an airport's capacity to process traffic on its airfield is fixed, depending on weather

⁹ Excerpts from Executive Summary of "Report to the Congress: A Study of The High Density Rule", USDOT, May 1996

conditions and runway configurations. A higher concentration of operations is likely to cause longer queues of both arrivals and departures."

One important reason that change to the rule was considered is the advances made in air traffic management. The FAA's traffic management system has changed dramatically since 1969 when the slot rule was implemented. Traffic management innovation and sophisticated technology equipment has enhanced the efficiency of the air space system.

The above cited comprehensive report on the High Density Rule, released by the U.S. Department of Transportation, concluded that the projected costs to consumers, airlines and communities of eliminating or modifying the rule currently outweigh the benefits, and that it would not be in the public interest to initiate a rulemaking on this issue.

In this paper, a brief summary of some alternatives to more and more construction at Logan are introduced. Some of these concepts are an out-growth of a simple idea but complex to put into practice. The solutions require action on a local regional, and national basis so political support will need to be garnered to effectively solve the delay dilemma

Airside Development and Expansion

Since the concerns of expanding the airfield to squeeze what additional capacity there is left on the physical facility by constructing more pavement for landing, departing and taxiing aircraft is being pursued by Massport, this report will not address the alternatives of expanding the Logan airside to gain additional capacity. The current Massport proposals, were they to be allowed and implemented, represent the maximum feasible significant expansion of airfield pavement at Logan.

There are significant obstacles to these proposed improvements including legal obstacles, environmental issues and the disapproval of citizens of communities in the Greater Boston area which are already impacted by noise, air pollution, and construction activities at Logan.

Instead of building additional pavement, Massport needs to explore other options that might relieve existing and future airport delay at Logan. These larger scale issues may require action from various agencies going across state lines and focusing regionally or even nationally to find a solution that looks at the larger problem of airport congestion.

Improvements to Air Navigation and Equipment

The FAA is currently working on several programs to enhance air traffic control, air navigation, and weather information that may be able to reduce future airport and airway congestion and delay. There are several types of emerging technologies that should help pilots navigate and land during low or reduced visibilities.¹⁰

An Enhanced-Vision System (EVS) uses different types of sensing methods like forward-looking infrared and millimeter wave radar to allow the pilot to view the approach and objects that could be obscured due to weather or darkness such as hill, towers, or other objects which could be a hazard to air navigation. Synthetic-Vision System (SVS) is enhanced EVS using information included in a data base regarding the terrain and runway. SVS information would be displayed "in front" of the pilot through the use of a head-up display.

¹⁰ J. Glen Moore cited by CRS Report for Congress: Airport Congestion: Background and Some Policy Options, Stephen J. Thompson, May 20, 1994

A head-up display (HUD) of an enhanced-vision system (EVS) or synthetic vision system (SVS) is a tool being developed that allows the pilot to see the runway better through a pull-down piece of equipment located in front of the pilot. The HUD allows the pilot to view the approaching runway in natural light without the need to move his head or adjust his vision from far-sight to short-sight to observe the EVS or SVS display.

While certainly adding to safety considerations during any IFR approach procedure, these emerging technologies may be able to ultimately provide reduced minimums for certain approach configurations; thus allowing additional operations to occur in poor weather conditions than are presently feasible. These improvements may have a significant impact on reducing weather-related delays.

The Global Positioning System (GPS) now jointly operated by the U.S. Department of Defense and the U.S. Department of Transportation is highly likely to make precision instrument approaches available to many runway ends where no physical obstacles exist. It is the FAA's intention to provide new approaches using GPS instead of the traditional Instrument Landing System (ILS) presently in wide use.

The cost of GPS equipment supplemented by some ground equipment is significantly less than ILS. The data received from this system of earth-stationary and earth-orbiting satellites would allow pilots to determine the latitude, longitude, and altitude of their aircraft to precision level standards.

Already GPS is widely being used as a non-precision approach at air carrier and general aviation airports. FAA is currently testing its usage for precision instrument capabilities. The FAA is hopeful that GPS can increase airport capacity because it will allow for the implementation of additional instrument approaches, giving air traffic controllers more options to route traffic into the airport.

One cautionary note regarding the advent and usage of GPS is the shifting of the operational patterns which may occur because of the greater airfield operational flexibility. *Massport is urged to coordinate implementation of new GPS approaches with the community so that noise, frequency of operations, odor, and other concerns of the community can be carefully considered in the choice of runway approaches and runway priorities.*

Intercity/Corridor Transport Ground Transportation Alternatives

Providing alternatives to air transportation by focusing on improvements in ground transportation including rail and transit systems could reduce the need for new airport capacity. If ground transportation options were more convenient and competitive for traditional air travelers, these transportation modes could present a viable alternative to congested airports for travel in corridors where these modes are available.

Setting regional and national policies to promote better ground transportation alternatives and new technologies such as high speed rail, magnetically levitated trains, and other related technologies must be a priority to reduce airport congestion. In a congressional research service report it was noted that "Public policies regarding ground transportation alternatives, and related emerging technologies, might be able to significantly reduce future airport congestion and delays, at least in some corridors such as Boston to Washington, D.C." ¹¹

According to the FAA's 1993 Aviation System Capacity Plan, nine of the 33 airports anticipated by to be "congested" by 2000 (exceeding over 20,000 hours of delay) lie along the Atlantic Seaboard between Washington, D.C. and Boston. These airports include the following:

¹¹ Congressional Research Service, The Library of Congress, "Airport Congestion: Background and Some Policy Options", Stephen J. Thompson, May 20, 1994

- BDL Windsor Locks, CT
- BOS Boston, MA
- BWI Baltimore Washington, MD
- DCA Washington National, VA
- EWR Newark, NJ
- IAD Washington Dulles, VA
- JFK New York John F. Kennedy, NY
- LGA New York LaGuardia, NY
- PHL Philadelphia, PA

The ability to provide alternate modes of transportation rather than air travel will be crucial to the entire eastern coast. The currently-programmed improvements (electrification) to the railroad corridor between New York City and Boston should provide an increase in service frequency and a reduction in rail time travel to about three hours, city to city. Better railroad travel time and increased frequency should lead to a shift to rail transportation between these two cities. The Harvard University paper previously cited projects a shift from air to rail of about one million passengers annually in 2010, about three percent of projected demand at that time. Others who have studied the issue are in general agreement with this estimate.

Unfortunately, further significant improvements, such as "mag-lev" trains operating in the 150-200 mile per hour range on new rights of way could cost as much as \$20 to \$30 million per track mile, plus rolling stock. In addition, significant right of way and environmental obstacles would have to be surmounted.

As an example of airport revenues being used to fund alternative transportation sources: New York's Governor George Pataki has recently outlined a plan that will eventually link J. F. Kennedy Airport to Pennsylvania Station in downtown New York. The Kennedy/Penn rail link would be funded as part of the "Master Links Transportation Plan" using \$750 million in passenger facility charge

revenues, with the balance coming from the Port Authority of New York and New Jersey's capital funds.¹²

It is recognized that alternatives to develop ground transportation modes is a national as well as regional issue. *It is recommended that Massport actively pursue regional development of rail and bus capacity and capability for the purposes of relieving future airport delay through enhanced Northeast Corridor surface transport, as well as enhanced surface transport to and from Logan. Massport should support and contribute funding for these efforts.*

Improvements in Communications Industry

Developing technologies including video conferencing, world-wide-web communications and other emerging communications industry improvements may indeed influence future air transportation for business travelers. While the impacts of these communications enhancements are currently difficult to quantify, the improvements could change the way of doing business, saving costs and expenses while providing economies in resources. This may facilitate a dramatic change in the way our society does business and travels to meet business needs. For example, satellite inter-active telecasts are now a regular feature of the information transfer programs of major professional groups.

As airport delay increases, many business people may find it more effective to use these emerging techniques rather than to travel by air. This may be especially true of business travelers on one to two day trips. The air transportation industry, though hardly currently threatened by this communications technology, may find that this alternative may impact future travel forecasts.

¹² As cited in *Airports*, 1996 The McGraw-Hill Companies, May 7, 1996, page 180

Educating the business travelers to allow them to experience this new technology would provide a future resource to choose this option over air travel, reducing demand for limited airport capacity. It is not practical at this time to estimate the extent to which growth in demand for air travel might thereby be reduced.

Massport should expose business travelers to the potential of these emerging technologies. These efforts should be cooperative with leading providers of electronic communications technology, with business groups and professional associations, and with universities. In addition to supporting marketing efforts, Massport should participate in the development of facilities and the enhancement of technologies. In both cases it should encourage participation by Airports Council International and similar groups.

Using and Expanding Under-Utilized Airports

Another alternative is to provide an air transportation system that allows further utilization of currently available New England region airports, instead of increasing the capacity of Logan.

However, it was noted in a report prepared for Massport entitled *Air Service Patterns in New England*¹³ that "unless there are significant changes in demand patterns, capacity, or ground access times at Logan, the regional airports are not expected to attract significant levels of traffic away from Logan within the immediate future." This report points out that over 70% of the total operations at Boston, Bradley, Providence, Portland, Manchester, Hyannis, Nantucket, and Worcester airports were recorded at the seven smaller airports. However, these seven regional airports account for only

¹³ LOGIC - "Air Service Patterns in New England", prepared for the Massachusetts Port Authority by Flight Transportation Associates, Inc. subconsultant to Frederick R. Harris, Inc., February 8, 1993, page 41

30% of the enplanements. Thus, Logan accommodated 70% of the enplaned passengers with only 30% of the operations. The report recognized two types of regional airports, including:

- Type A those who have established air carrier services parallel to Logan, and
- Type B those that serve primarily as commuter feeders to Logan.

The report indicates that the "larger regional airports experience sufficient demand to provide origin-destination services for their respective market areas. Although some destinations can only be reached through connections at Logan or other major cities." Further, "The role of Boston or New York as a hub has become less significant for those regional airports which have attracted sufficient demand to establish services beyond the most important markets." This suggests that as the regional airports develop more mature markets and additional air service the demand for hubbing activities at Logan may be reduced.

In order to decrease delays at Logan, it will be necessary for more Type B airports who are commuter feeders to Logan to provide "stand-alone" air service from their own regional facility. In addition, the larger regional, Type A airports must expand their market base to reduce their connection requirements with Logan. Expansion of these regional airports is an on-going process, and much has been or is being done. Airside, landside, and terminal construction will be an important element in allowing these facilities to become poised to expand their air service. The Air Service Patterns in New England Study indicated that all the regional airports could accommodate "very significant expansions in passenger handling capability" and many of the airports have already completed terminal expansion projects. However, that report further stated airside expansions including new runways would be difficult to accomplish due to environmental constraints.

This cited report suggests that because of the continued congestion surrounding Logan, both from an airport delay standpoint and a ground access problem, that passengers will voluntarily choose other alternative airports for service. It was recognized though, that these regional airports have a tough time competing with Logan for frequency, international activity, and market competitiveness for fare prices.

Since many agree that help for delay increases at Logan can come from the further development of the regional airports and establishing a market base for these under utilized airports, the key to the solution will be to identify what specifically can be done to set up additional air services at these regional airports.

An Air Passenger Service Study on New England's Regional Airports¹⁴ identified that "each of the regional airports has some service underdevelopment and could viably support additional jet service". It was noted that of the eight regional study airports analyzed, Portland, Manchester, Worcester and Providence are the most impacted by Logan in terms of service area traffic using another airport. Hartford and New Haven were identified as being related to the New York airports in terms of traffic diversion. Burlington and Bangor airport service areas were identified as autonomous.

From the noted passenger survey, the fare survey at the regional airports noted that the air fares are generally higher at the regional airports relative to Boston or New York although not in all markets. The most significant differences in fares tended to be in the shorter haul business travel markets to New York, Washington and Philadelphia. Nonstop flights at the regional airports generally have higher fares than connecting services.

¹⁴ New England Regional Airports Air Passenger Service Study, Phase I Summary Report, prepared by New England Council, Hoyle, Tanner Associates, Kramer Associates, SH&E, Inc, November, 1995.

If profitability to the airlines is the only factor that will establish convenience to passengers and minimize Logan's demand, it will be necessary to look toward ways to attract service, provide incentive packages, and make deals with the carriers to establish the service that will serve the overall public interest not just the airlines.

The cited passenger survey recommended a strategy of identifying opportunities for fare parity to local carriers and demonstrating that fare reductions will be offset by increased revenues. It was noted that because "regional carriers have fewer seats to sell, the chances of obtaining fare parity are enhanced where there is the most jet service".

All agree that there is no simple solution to change the way airlines do business. However, the idea that the passenger will eventually re-shape the scheduling of the airlines does not appear to be a viable approach, either for the short or long time-frame. The distribution of traffic between the regional airports and Logan has remained fairly constant. Thus, the pressure from market forces has not induced any substantial changes in the way the regional air service market in New England is operating.

One specific need which has been identified is to substantially improve ground access to the Worcester airport, to overcome one of the major impediments to its marketing and use. This should be a responsibility of the Massachusetts Highway Department. Reconsideration of the role of Hanscom Field has also been urged, coupled with an enhanced ground link between Hanscom and Logan. A joint effort of Massport and the Massachusetts Executive Office of Environmental Affairs would be needed.

It is time to take some measures to induce those changes. It is recommended that Massport step-up their existing activities to promote the development of the other New England Airports. Massport's

participation in the New England Council Study is a beginning which has provided marketing assistance and technical services to specific regional airports. Follow-on efforts to marketing regional airports to air carriers, and to research and analyze traffic leakage should be fully supported by Massport. More aggressive tactics are needed to actively induce additional services to the regional airports. *Massport, together with the other regional airports, should make regional airport market service expansion a priority.*

There are financial constraints on the airports whose "logical service areas" abut Logan's. There are impediments to Massport providing significant assistance to facilities in which it has no "stake". Therefore, it is recommended that Massport pursue the acquisition of partial interest in those airports with the greatest potential to provide alternative service to Logan, with the view of a) making Massport resources available to those airports and b) diversifying Massport's interests.

Improvements in Airspace and Approach/Departure Management and Procedures

A goal of the FAA's traffic management function is to ensure that the number of aircraft in the air to any location and in any airspace does not exceed the personnel or equipment capability to handle these aircraft. To ensure attainment of that goal, the FAA will hold aircraft on the ground, and assign a departure time that limits the demand to a manageable number of aircraft at the destination airport. This "ground delay program" is a keystone of the modern traffic management system.

For a given set of operating conditions (wind, weather, runway configuration) with operational limits, the ground delay programs define specific departure times for flights to match the demand to the available capacity at an airport, or in a sector of enroute or terminal airspace.

There are three types of ground delay programs currently in use: Select (selected flights, individual time assignment), general (fifteen minute block delay factors), and a combination of select and general. Other programs that are currently available to assist in the management of delay from an airspace perspective and to ensure operational safety include:

- * Preferred Routes
- * National Route Program
- * Managed Arrival Reservoir
- * Limited Airborne Holding
- * Special Event Programs
- * Airport Reservation Office
- * Sector Traffic Management Program
- * Severe Weather Management
- * Severe Weather Avoidance Plan
- * Departure Flow Management
- * En Route Flow Management
- * En Route Spacing Program
- * Miles-in-Trail and Altitude Restriction
- * Arrival Flow Management
- * Arrival Sequence Program
- * Enhanced Traffic Management System
- * Terminal Air Traffic Control Automation
- * Airport Surface Traffic Automation
- * Terminal Doppler Weather Radar
- * Wind Shear Warning Systems
- * Collision Avoidance Systems
- * Precision Runway Monitoring System
- * Global Positioning System

These improvements to the traffic management system have favorably affected delay at congested airports. Other programs to enhance Air Traffic Control facilities, programs, and processes will be a further step in making the air traffic system run as efficiently as possible - a key link in the transportation system.

An issue at Logan is whether the FAA can and will be proactive in concert with Massport to further reduce delay; moving beyond its apparent support of the airfield improvements project. For example, might the FAA expand and enhance its implementation of selected elements of the above measures to influence the scheduling practices of air carriers?

Additionally, it is recommended that Massport enhance electronic navigational aid in the following ways:

- * Provide precision instrument equipment (GPS or CAT II ILS) on Runway 33L
- * Implement Parallel/LDA Point in Space Approaches to Runway 4L
- * Install the following systems as developed:
 - ◇ Wake Vortex Avoidance System
 - ◇ Vortex Advisory System
 - ◇ Global Positioning System on all candidate runways
 - ◇ Precision Runway Monitoring Radar System

With the full electronic navigational aid upgrades, an Enhanced Preferential Runway Advisory System can be developed that will reduce delay at Boston Logan Airport while also reducing impacts.

Massport, in conjunction with the FAA, should implement new traffic management systems that work with the goals of the community to reduce noise and congestion. In addition, work should continue to quantify the benefits that improvements in airspace, approach and departure management and procedures can have in reducing delays at Logan.

Demand Management Policies

The establishment of congestion fees, or peak-period pricing, in which such fees would be charged for use during peak hours would have the objective of shifting some aircraft operations to other times of the day or week, thereby lessening the number of operations during the peak. Using peak period pricing to improve the airport's capacity during periods of congestion and delay is favored as a tool by many economists.¹⁵

A goal of charging additional fees at Logan during peak hours is to induce a shift in the aircraft operations during the existing peak time period to less congested hours of the day and days of the week. The result would be to reduce the delay during peak-hour operations.

Another goal of congestion fee pricing would be to encourage the airlines to expand services at other under-utilized airports. Could the peak-hour pricing revenue be used to promote airline expansions into these other market areas?

An example of a demand management policy is an action of the Port Authority of New York and New Jersey which operates LaGuardia, John F. Kennedy, and Newark Airports. In 1968, the Port Authority raised the minimum landing fee for aircraft during peak hours by a factor of 5, while keeping the off-peak fee the same. Peak-hour surcharges produced significant beneficial results at all three of these airports.

¹⁵ "It may be possible to say with considerable confidence that use of the facility with a congestion toll, although not globally optimal, would be more efficient than use without the toll." In Alan Carlin and R.E. Park, "Marginal Cost Pricing of Airport Runway Capacity", *American Economic Review*, Vol. 60, June 1970, pp. 310-319, at p. 310 as cited from CRS Report for Congress, *Airport Congestion: Background and Some Policy Options*, Stephen J. Thompson, May 20, 1994

The Port Authority's congestion fee was challenged in a court suit, and was up-held by the court as follows:

"The United States District Court found in favor of the Port Authority, ruling that the defendants were justified in distinguishing different classes of aircraft on the grounds of safety and efficient use of landing facilities. The court further recognized that the fee was meant to induce aircraft operator to use other times of the day or other facilities."¹⁶

The Port Authority continues the policy of using peak hour pricing at all three of the metropolitan New York airports although the peak-hour fees have not substantially changed since their initial implementation. The result of the low price fee surcharge limits the effectiveness for significantly shifting operations during the peak period.

In 1988, Massport instituted a management pricing program at Logan entitled PACE which based its landing fees both on the weight and the operations of the aircraft where previously the landing fees were based (as is traditional) only on weight. The PACE program succeeded in reducing the number of smaller planes by this pricing program. Logan increased its on-time performance record during this period.

¹⁶ U.S. Congress, Congressional Budget Office, *Paying for Highways, Airways and Waterways: How Can Users be Charged?*, Report Number ISBN 0-16-03797-7, May 1992, Washington, D.C. U. S. Government Printing Office, 75 p., at p.24 as cited by CRS Report for Congress: *Airport Congestion: Background and Some Policy Options*, Stephen J. Thompson, May 20, 1994

The U.S. Department of Transportation disallowed this program¹⁷, citing the PACE program as discriminatory pricing since it did not differentiate between congestion and non-congestion periods and the allocation of cost between weight and operations was found to be arbitrary.¹⁸ (It is noted that Massport plans the release of a study of the impacts of the PACE program for mid-summer 1996).

Because Logan has such frequent commuter services acting as a New England hub for both code-sharing regional affiliates (typically a smaller airline which agrees to share similar functions like reservations, frequent flyer programs, gates, etc. with larger, name-recognized airlines) and smaller, independent airlines, the number of passengers on these aircraft are small but their frequency is high.

As noted in one report¹⁹ noted "More than 60 percent of regional flights at Logan are in aircraft with 19 or fewer seats. Logan also has the highest overall percentage on non-jet aircraft operations at more than 50 percent and the smallest average aircraft size among major U.S. airports".

This same report from the Transportation Research Board concluded that certain factors must be present for a peak period pricing program to offer tangible benefits at an airport. These include:

- * Regularly occurring, measurable congestion,
- * No external regulatory scheme that reduces market forces (i.e. slots),
- * Peak-period fleet mix sensitive to small fee changes,
- * Quantity of air service is available so as not to eliminate access to a particular community.

¹⁷ The Boston Sunday Globe, "Small planes a big factor in airport congestion", Charles M. Sennott, April 14, 1996

¹⁸ Peak Hour Pricing at Logan Airport, Massachusetts Port Authority, April 1993

¹⁹ Transportation Research Board Record 1461, Peak Pricing As It Might Apply to Boston-Logan International Airport, Claire Barrett, Richard J. Murphy, Scott Lewis, Mark Drazen, Lynn Pearson, Amedeo R. Odoni, and William Hoffman

The TRB Report modelled the impact of a revised fee structure and resultant cancellations and flight shifts, predicting a reduction in delay hours at Logan and significant benefits. The effect on the air carriers shown in this model indicated that the three major code-sharing airlines (Delta, Northwest, and USAir) would be most affected by cancellations of flights.

It was noted that "although these three major regional airline systems would be affected, they and their code-sharing jet partners (and their passengers) also would be among the primary beneficiaries of the reduced congestion and delays at Logan". Obviously, one of the key goals of a demand management policy would be to encourage regional flights with fewer passengers to re-schedule activities in non-peak hours; thus, spreading out the use of the airfield to accommodate the demand and minimize the delay.

Still another goal for a demand management policy would be to encourage the use of larger aircraft carrying more people while using relatively the same operational time on the airfield. Eliminating or consolidating flights to provide higher load factors would maximize airline revenue, reduce operations, and provide for delay reduction. Scheduling for flights and selection of aircraft size has traditionally been market driven. It is time to introduce other economic factors into the decision matrix.

The public interest is a key concern in trying to get the greatest benefits with the existing system. Maximizing net benefits consistent with public interest considerations is particularly important at congested facilities, since access must be limited in the interest of providing efficient operations. In domestic markets, flights using large jet aircraft tend to produce greater benefits than commuter or general aviation flights with smaller prop aircraft.²⁰ Therefore, it makes sense to look at management

²⁰ "Report to the Congress: A Study of The High Density Rule", USDOT, May 1995, Chapter 7, Sub-Section: Reallocate Slot Pools Among User Groups, Page 111

techniques that will encourage usage of larger aircraft at Logan. Assisting the airlines in scheduling to maximize load factors in a manner which did not materially affect their competitive position, would not only be profitable for the airlines but would also reduce delay.

Congestion pricing, peak-period pricing and techniques which base landing fees on functional categories relating to operations (landing or take-offs, weight (or size) of aircraft, and capacity to meet peak period demand will be particularly useful in reducing delays.

The models which have been previously performed on peak period pricing scenarios have shown that this management technique can produce tangible benefits in reduction of delays. This type of management technique allows for better utilization of the airfield over time while encouraging additional development of under-utilized airports. It has advantages of negligible initial capital costs for all participants, of flexibility and specificity in design, in phasing-in to allow optimum "adjustment" periods for affected carriers, and in the ability to be readily revised as conditions warrant.

A properly-designed and implemented form of congestion pricing, among the alternatives under consideration, will afford the greatest degree of delay reduction at Logan, for a given investment; and overall has the greatest potential for benefit. It must be recognized, however, that the operations profile at Logan is comparatively rather flat, and thus the extent to which flights can be rescheduled from peak hours to non-peak hours in response to fee changes is limited. The greatest benefit will likely come from consolidation of flights, thus increasing load factors.

Obviously Massport has previously experienced some regulatory and political challenges in implementing a demand management technique. Peak period pricing is currently being evaluated as an alternative in the Environmental Impact Statement and Environmental Impact Report being prepared for the Logan Airside Improvement Planning Project.

Consideration should also be given to a quite different approach to addressing the efficiency of Logan Airport during peak operating periods and in carrying out its primary mission. In a simplistic form, the mission of the airport might be defined as "the accommodation of as many passengers as feasible under existing conditions with a minimum of delay" with some stated commitments to minimizing impacts of operations.

The measure of efficiency presently used by Massport and the FAA relate to numbers of aircraft operations handled in specific periods (i.e. per hour); and the hours of delay experienced in handling those operations. Massport's efforts have focused on operational and facility expansion approaches to increase the capacity for total aircraft operations under restrictive conditions (i.e., when use of Runway 15/33 is required, or when visibility is restricted).

However, if the aircraft passenger is identified as the "unit of concern" in the airport's primary mission, the fundamental measure of efficiency and the principal objective of the airport would be to maximize the number of passengers transiting the airfield per hour. If maximizing the throughput of passengers were the dominant objective of the management and operation of the airport facilities under the control of Massport, the measures considered might differ from the current proposals. Massport is already expanding the capacity and improving the efficiency of access roads, parking garages, and terminals, with the principal measure being the number of passengers able to be accommodated in an interval of time.

One approach might be to use the hourly integral of aircraft type/seat capacity adjusted by the current or projected average load factor for each aircraft type and operator or route. To maximize facility efficiency and to provide the maximum feasible throughput of passengers during critical periods, Massport could through defined mechanisms encourage or give preference to the use of its facilities under its control (i.e. gates, hold rooms, terminals) during critical periods by aircraft and operators

providing service to the greatest number of passengers. Massport would apply this approach through lease terms and operating agreements with its lessees and aircraft operators.

At some point in the future, Massport, the FAA, and other transportation officials will have to make a decision about mass public air transportation. If it is decided that "the good of the many outweigh the good of the few" for the use of limited physical facilities, then management techniques could be implemented that encourage larger aircraft users and higher load factors. It is noted that the effects of these techniques may well have a larger impact on the regional carriers and lower load factor routes. In addition, an increase in the disturbance to neighbors to Logan may be effected since these techniques encourage use by larger aircraft.

Massport is encouraged to develop congestion pricing, peak-period pricing and other delay management programs encouraging increases in load factors, more even distributions of operations throughout the day and expansion of airline services at regional airports. Evaluation of specific strategies to manage demand should evaluate the impact of the various fees established for the peak period pricing technique. Modelling should include a variety of price scenarios to determine the relationship between spreading demand to non-peak hours as well as shifting demand to other airports.

Concluding Comments

Efficient management of the existing airport facility, improvements to air navigation equipment and airspace control, uses of all modes of transportation to transport people where they want to go, increased use of existing under-utilized airports by increased air service and frequency, and providing aggressive measures to manage the demand at the airport are all alternatives that will reduce the current and forecasted aircraft delay at Boston Logan Airport.

It is recognized that combinations of these alternatives will be necessary to address the growing delay concerns at Logan. Too much time has been spent trying to solve the problem by constructing more pavement. It is recommended that Massport focus substantial efforts (as are other airports) on implementing some of these alternatives to reduce delay at Boston Logan Airport.

Specifically, Massport should establish some goals for shifting the demand at Logan by using or implementing other alternatives than airfield expansion. Some suggestions to consider would include:

1. Establishing goals to gradually shift future demand at Logan to other transportation modes, other airports, or communications techniques over a set time period including 5, 10, 15, and 20 year goals. This type of master planning technique will focus attention on shifting demand to other avenues and will allow for a concentrated effort to recognize the growing delay concern.
2. For each alternative, specifically target activities that Massport can develop that support each of the goals. Establish time-frames in which these activities can be accomplished. Identify obstacles including economic, political, and policies issues that may retard progress for each alternative. Develop a strategy to overcome those obstacles.
3. Implement demand management policies that will augment the goals established. Document their effectiveness and expand these policies to induce a shift in demand for Logan.
4. Measure and monitor the effectiveness of delay reduction for each alternative. Encourage exploration of other alternatives as they develop over time.

It is recommended that Massport, the Department of Transportation, the Massachusetts Executive Office of Transportation and Construction, and the airline industry step further away from their traditional roles and responsibilities, and attempt to minimize the interference of self-interest, in order to cooperatively develop coordinated recommendations to senior legislative and executive bodies and commitments to funding and implementations. Otherwise, the future holds only increasing impacts, frustration, and costs; with the concomitant development of greater and opposing pressures for action.

Appendix B

Memorandum by David Standley, P.E.
dated March 27, 1996
on Logan Odor Issue
regarding "Analysis of Odor Complaints at Logan Airport"
prepared by KM Chng Report, March 1996

MEMORANDUM

To: Bernice Mader, Chair, MPA Logan Community Advisory Committee
Subj: Logan odor issue
Ref: "Analysis of Odor Complaints at Logan Airport", KM Chng Report, March 1996
Date: March 27, 1996

I have reviewed the subject report, prepared by KMC for Massport (through Vanesse Hangen Brustlin Inc.), and have asked Myleen Leary to provide additional copies for you and the other members of the Consultant Team. KMC analyzed Massport odor complaint data for the years 1991-1994, and has produced a very interesting document. The purpose of this memo is to highlight the KMC findings and discuss the implications for the CAC review and response to the Airside Improvements Project.

Sources of Odors:

KMC reports that jet engine idling and low power taxiing are the operating conditions during which the greatest concentration of potentially odorous compounds are emitted, the cause being inefficient combustion. KMC also suggests that high-thrust operations (i.e., start of take-off roll) may produce significant amounts of odorous compounds even though combustion is relatively efficient, because large quantities of fuel are consumed. All of these operations are, of course, conducted at ground level. KMC also reports that considerable variation in discharge of odorous compounds occurs among aircraft and aircraft engines, attributable to differences in engine design and maintenance.

I agree with these conclusions. While a close look at the KMC data might suggest some odor impact of overflights, I feel the data is too limited to support any speculation in that regard.

Period of Review and Sources of Data:

The review period of the KMC study was the years 1991 through 1994. The source of complaint data was the records of the Massport Noise Complaint Line (which generate Aircraft Disturbance Reports). Meteorological data was obtained from both the National Weather Service and the Massport ADRs. Runway use configurations associated with complaints were obtained from the ADRs. Other operational data was provided by Flight Transportation Associates.

Factors Causally Associated with Complaints:

KMC statistically analyzed the association between a number of factors which might be causally associated with the complaints received, and the complaint history. While a number

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of factors were associated in time with specific complaints, the ones which appeared to be causal and explain the largest percentage of complaints were, in order of importance,

- Ambient temperature—61-80° F
- Time of Day—7-10 a.m., 4-9 p.m.
- Critical wind direction/runway use combinations for the downwind location of interest

The "Ambient temperature" range is suggested by KMC to represent conditions maximizing outdoor activity and open windows.

"Time of Day" appears to be a metric which both substitutes for and incorporates airfield activity and community activity, resulting in maximum exposure potential. Probably the most important activity factor is queuing of aircraft on taxiways (explicitly recognized by the community-FAA "agreement" to limit queuing of jets on TW November to five planes). These first two factors account for a majority of all complaints registered.

The third factor accounts for the largest single group of complaints in a given neighborhood, as would be expected.

I was somewhat surprised at the outset to read that wind speed, atmospheric stability and turbulence did not appear to be significant. On reflection, I would attribute that to the fact that the NWS measurements of those factors are "gross" and likely rather different from the conditions which exist at ground level at the ends of operating runways; where pavement and water temperatures, and aircraft activity, may establish local conditions not measured by the available instrumentation.

Number of Complaints:

During the period considered by KMC, Massport received a total of 272 odor complaints through its Noise Complaint Line. (These are distinguished from those complaints which were about noise, but also mentioned odor as a source of irritation.) This is an average of slightly more than one complaint per week! I would consider this to be a rather low response rate to an odor source, in the absence of other factors. KMC further isolates the combinations of conditions likely to create odors in the neighborhoods around Logan, and finds such conditions occurring during about 10% of the total hours analyzed. Treating each complaint as an "incident" representative of one hour, KMC derives an overall "incidence frequency" of about 8%. In other words, during only about 8% of the time during which one might expect complaints were complaints actually registered through the Noise Complaint Line. KMC attempts to analyze the factors which might affect the response rate, and does so competently. Principal factors suggested by KMC as potentially influencing the "complaint rate" include physical factors (i.e., micro-meteorology) which would preclude significant concentrations of odorant in the presence of the analyzed factors predisposing to complaint; as well as factors affecting the predilection of residents to phone the Complaint Line.

My observation is that these numbers are not consistent with the stress placed on odor concerns by residents of the communities immediately adjacent to Logan, both over the years in my experience and during the current ARC/CAC process. This requires discussion among the participants.

My concern is that Massport may interpret these numbers as indicative of a "*de minimus*" problem

Neighborhoods Principally Affected by Odors:

KMC found that three neighborhoods were the principal origin of the complaints received during the four-year study period. These are Court Road in Winthrop (86), "Orient Heights" in East Boston (which I assume includes the Bayswater Street area) (71), and Pleasant Street in Winthrop (40). All other areas registered less than 20 complaints each over the study period, with Eagle Hill, Jeffries Point, Harborview (all East Boston), and "Upper Winthrop" each registering in the 10-20 complaint range.

I am surprised that the Jeffries Point and Eagle Hill areas seem not to be heavily impacted by odors generated by aircraft activity in the immediate vicinity of the terminals. Otherwise, I think the findings, in terms of the areas most affected by odors from aircraft engine emissions, are consistent with logic and past representations by community representatives.

Odor Response and Potential for Reduction of Odor Impacts:

KMC correctly observes that human response to odor stimulus is non-linear; in fact it is logarithmic. That is, the relationship between the perceived odor intensity, "I", and the concentration of odorant, "C", is expressed as $I = k (C)^n$ where k is a constant and n is an exponent, both of varying magnitude but always positive. This yields a straight-line plot on log-log paper, with k establishing the intercept on the y-axis and n the slope of the line. (n is normally less than unity). Under the case where $n = 0.7$ (the uppermost of its usual range), a reduction of the concentration by a factor of ten would change perceived odor intensity by a factor of about 5; in other words, the result is only about half the effort. Were $n = 0.2$ (the lower end of its usual range), the same reduction of the concentration by a factor of 10 would change the perceived odor intensity by only about 1/3; in other words, the result is less than 5% of the effort. Typically, a change in odorant concentration must exceed about 20% to be generally detected as a change.

A conclusion to be drawn from the above is that major reductions in source strength (aircraft engine emissions of odorous compounds in specific locations) will be required to effect perceptible improvement in odor impacts. Conversely, changes in aircraft operating procedures and locations, as proposed in the Airside Improvements Project, should not be expected to result in significant improvement.

Of much greater potential odor impact is the projected increase in aircraft operations at Logan over time. Without significant reduction in the rate and change in the nature of jet engine emissions, a 25% increase in operations would have two impacts readily detectable as increases in odors in the community. First, the concentration of odorous compounds would increase during those time periods when operations increased by such a percentage; and second, the time periods of intensive aircraft operations would be significantly extended

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to accommodate the increase in operations (since the airfield is at or near capacity during peak hours now).

Summary and Conclusions:

KMC stresses that the problem of odor impacts on residents of the adjacent communities must be considered real and significant. I feel that the data supplied by Massport likely under-represents the scope and intensity of odor impacts because of a general tendency of the (relatively stable) population of the communities to (a) become disillusioned about the value of complaints, (b) utilize other methods and fora to express their concerns, and (c) to become somewhat desensitized or inured to this odor stimulus. It is impossible to judge whether different and more representative data might result from a different method of determining either or both community response or odor concentrations in the neighborhoods. However, I suggest Massport consider a trial implementation of a focused odor complaint survey project in one of the most impacted areas, over the coming summer season.

Conversely, again, were a significant change in operating procedures or locations to expose a new population to jet engine odors, there would likely be a substantial increase in the number of complaints registered. The construction of RW 14/32, and its use by jet aircraft for a takeoff in the 14 direction, would result in a start-of-roll point moving about 2500 feet closer to Jeffries Point compared to takeoffs on RW 9. Jeffries Point would be downwind of such operations on a southeasterly wind. The effect of construction of the Centerfield Taxiway on odors in the Court Road and Pleasant St. areas of Winthrop would be similar in manner but not in magnitude. The distance between these areas and the Centerfield TW would be about 2-3000 feet, compared to 3-4000 feet from TW November. These areas are and will continue to be impacted by operations involving RW 4R/22L, which is about 1000 feet from the backyards of houses on Court Road.

The identification of the more impacted areas is consistent with other information, and intuitively correct; despite the relatively small number of registered complaints.

The potential odor impact changes which may be associated with the current Airfield Improvement Project are overshadowed by the potential odor impact changes associated with the growth of Logan operations, and the shift of commuter traffic from propeller to jet propulsion.

David Standley, P.E.,
Consultant to the CAC

Appendix C

Draft Proposal for Discussion

prepared by David Standley, P.E.

dated May 24, 1996

on "Efficiency of Utilization of Facilities during Peak Hours"

MASSPORT LOGAN COMMUNITY ADVISORY COMMITTEE LOGAN AIRSIDE IMPROVEMENTS PROJECT

EFFICIENCY OF UTILIZATION OF FACILITIES DURING PEAK PERIODS

A DRAFT PROPOSAL FOR DISCUSSION

May 24, 1996

The Consultant Team to the Logan CAC suggests consideration be given to addressing the efficiency of Logan Airport during peak operating periods, in carrying out its primary mission. We understand that mission to be the accommodation of as many **passengers** as feasible under the extant conditions with a minimum of delay. (There are, of course, modifiers to this mission expressed as commitments to minimizing impacts of operations; but discussion of those constraints is not the purpose of this paper.)

Heretofore, the metrics of efficiency utilized by Massport and the FAA relate to numbers of aircraft operations handled in specific periods (i.e., per hour); and the hours of delay experienced in handling those operations. Their efforts have focused on operational and facility expansion approaches to increase the capacity for total aircraft operations under restrictive conditions (i.e., when use of Runway 15/33 is required, or when visibility is restricted).

We propose that the aircraft passenger is the "unit of concern" and the *raison d'être* of the airport (with a bow to transport of parcels, not critical to this discussion). This, we believe, is also the fundamental concern of Massport, although it has not so expressed it to our knowledge. The expansions and modifications underway and proposed by Massport for terminals, garages, and other landside facilities, and the investments therein, are testimony in support of that assumption. It follows, therefore, that maximizing the throughput of **passengers** should be the **dominant objective** of the management and operation of the airport facilities under the control of Massport.

Thus, we further propose the fundamental measure of efficiency and of attainment of the principal objective of the airport, be the number of passengers transiting the airfield per hour. The total would be derived as the sum of all passengers arriving at and departing from all gate and apron positions within the hour of concern. It is unnecessary and probably

impractical to measure the comparable throughput of landside facilities (access roads, garages, terminals). In any event (as noted) Massport is expanding the capacity and improving the efficiency of those facilities, with a principal measure being the number of passengers able to be accommodated in an interval of time.

As a prospective planning and management tool, a surrogate for the measurement of the number of actual passengers transiting the airfield per interval must be established, of course. Our proposal is the hourly integral of aircraft type/seat capacity adjusted by the current or projected average load factor for each aircraft type and operator or route.

Massport would apply this approach, the minimizing of costs to the user community, to its management of the facilities under its control terminals, hold rooms, gates, and aprons through lease terms and operating agreements with its lessees and aircraft operators. To maximize facility efficiency, to provide maximum feasible throughput of passengers during critical periods, and thereby attain this objective, Massport would through those mechanisms encourage or give preference to the use of its facilities during critical periods by aircraft and operators providing service to the greatest number of passengers. A form of agreement for use of facilities is anticipated which would not cede full control at all times over a specific portion of Massport's property to a specific operator.

The effect would be observed in the scheduling of operations by the aircraft operators and owners using Logan in response to the incentives and strictures that Massport elected to institute. No actions or decisions by the FAA or DOT would be required. The effects would not be immediate in most cases, since current lease terms would be respected for as long as mandatory; but on the other hand, they do not need to be.

Letter 85

Community Advisory Committee

Anastasia Lyman, Co-Chair

Code	Topic 1	Topic 2	Comment	Response
85.1	Environmental Review Process	MEPA, FAA/NEPA	Massport for too long has been allowed to take a segmented approach to Logan's development, arguing that landside projects are designed to accommodate ground passenger handling; airside improvement projects are designed to accommodate aircraft handling; that neither generates traffic; and that Massport has no control over passenger and cargo growth.	<p>The purpose of the Airside Improvements Planning Project is to reduce current and projected levels of airfield congestion and delay and to enhance the safety of aircraft operations at Logan. Massport's proposed landside improvements are planned to enhance the efficiency of passenger processing, and include terminal modernization, as well as roadway, parking and service area improvements. The landside projects will not affect the design or implementation of the Airside Project, which has independent utility, nor will the Airside Project improvements affect the design or implementation of any of the landside projects. All airside and landside projects, where required, will continue to be the subject of separate comprehensive environmental analysis by project proponents in accordance with federal and state regulations.</p> <p>As expressed in the May 7, 1999 EOECA Certificate, Massport's Environmental Planning and Status Report (ESPR, formerly GEIR) process "is expected provide a big picture cumulative impact analysis of Logan operations, impacts and mitigation. It complements the project-specific EIRs," such as this one for the Airside Improvements, "helps to focus the review process of individual EIRs, and ensures that segmented project review does not occur in the context of MEPA review at Logan Airport."</p>
85.2	Purpose and Need	Delays	The Airside Improvement Planning Program is a short-range and limited response to a major concern about long-term trends, future growth, and increasing impact.	The Airside Project will provide immediate delay reduction benefits to Logan Airport users, and the delay savings will grow over time as passenger traffic increases. Although Massport only has jurisdiction over Logan Airport and Hanscom Field, and now operates Worcester Regional Airport, the agency has for years taken a leading role in supporting regional transportation initiatives and the development of alternate modes. In fact, since 1996, eight out of ten new air passengers in New England have used the regional airports rather than Logan Airport. Massport's support for regional transportation initiatives, its proposed PPP monitoring program, and the Preferred Alternative are part of Massport's long-term strategy for reducing delays at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
85.3	Analysis Assumptions/ Methodologies	Forecasts	Base year should be 1998 and planning period should extend to 2020.	<p>Consistent with the request made by EOE in its Certificate, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative. A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR.</p> <p>Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport is not expected to reach the 29 million passenger forecast presented in the Airside Project Draft EIS/EIR until 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport is not expected to achieve the 37.5 million passenger forecasts until 2015, and the 45 million passenger forecasts will not be achieved until 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a complete discussion of the planning forecasts.</p>
85.4	Delay	Model	The FAA data on delays show that the delay situation at Logan has improved since 1993 and is essentially in equilibrium, as assessed by the FAA.	Section 1.4 and Appendix C of the Supplemental DEIS/FEIR contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. The delay situation is not at equilibrium. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994. In fact, Logan Airport is the second most delayed airport in the nation for arrivals.
85.5	Analysis Assumptions/ Methodologies	Base Year	The Airside delay model (DELAYSIM) used hourly weather observations from 1981 to 1990. Weather patterns have changed significantly within the last five years due to effects from El Niño and La Niña. A new 10-year average should be constructed and used.	Comparative analysis of 1981 to 1990 weather with 1989 to 1998 weather identifies no significant differences in statistical properties.
85.6	Regional Transportation	Cargo	Item not specifically addressed in the DEIS/DEIR: Discussion of diversion to cargo to off-airport alternatives.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The Secretary of Environmental Affairs' Certificate on the ENF directed Massport to "discuss [these] off-airport alternatives and analyze the potential each has to divert passengers and/or cargo from ... Logan Airport." Cargo operations were not specifically analyzed because they account for only two percent of aircraft activity at Logan Airport and since most all cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
85.7	Regional Transportation	Regional Airports	Item not specifically addressed in the DEIS/DEIR: Considering the off-airport alternatives as a separate scenario.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.</p>
85.8	Regional Transportation	Regional Airports	Item not specifically addressed in the DEIS/DEIR: Failure to consider Hanscom Field in Bedford as a reliever airport for general aviation operations, origin/destination regional non-jet traffic, and short-haul origin/destination jet traffic.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.</p>
85.9	Regional Transportation	Regional Airports	Item not specifically addressed in the DEIS/DEIR: Considering the development of a second major airport, in discussion of environmental justice.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>Because the development of a second major airport would require ten to 15 years for site selection and environmental review in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester, T.F. Green/Providence and Worcester Regional airports, preclude the need for a second major airport.</p>

Code	Topic 1	Topic 2	Comment	Response
85.10	Delay	Model	Item not specifically addressed in the DEIS/DEIR: Detailing of the existing delay at Logan including delay derived directly from wind/weather and indirectly from delay at other airports.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data along with comparisons of Logan Airport delays within the context of delays at other United States airports.</p>
85.11	Noise	PRAS	Item not specifically addressed in the DEIS/DEIR: Documentation of history of PRAS and problems implementing it.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>Section 4.3 of the Supplemental DEIS/FEIR contains a history of PRAS development and performance at Logan Airport.</p>
85.12	Environmental Review Process	MEPA	The Secretary of Environmental Affairs should determine that significant planning deficiencies exist in the DEIS/DEIR that must be addressed. The DEIS/DEIR should be found inadequate, and a new Draft document should be required.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
85.13	Delay	Model	The proposed projects provide only limited and interim relief to whatever aircraft operating delays at Logan Airport are caused by or as a result of the airfield configuration. The delay problem as modeled and represented by Massport will get worse.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.

Code	Topic 1	Topic 2	Comment	Response
85.14	Regional Transportation	Regional Airports	There is no plan or program to deal with long-term growth at Logan. There are measures that could be instituted to effectively address transportation in eastern New England, but there is no discussion in this document. There must be a plan and a program to shift some current, and most growth in, air traffic and passengers away from Logan. Major expansion of service and capacity of other airports must be undertaken.	Massport continuously engages in planning for Logan Airport through the GEIR process (now called the <i>Logan Airport 1999 Environmental Planning and Status Report, ESPR</i>). The 1994/95 GEIR, subsequent Annual Updates including the 1999 ESPR, the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR all recognize the role that Logan Airport plays in the larger regional transportation context and acknowledge inter-city travel alternatives to Logan Airport. Furthermore, Massport and the FAA have taken the lead in promoting the development of regional airports as an alternative to Logan Airport. In 1995, the FAA and Massport co-sponsored the New England Regional Airports Air Service Study, which estimated the number of passengers that bypassed regional airports in favor of Logan Airport and recommended strategies for increasing regional airport air service levels and their attractiveness. FAA is sponsoring an upcoming New England Regional Airports System Study. Since 1996, there has been tremendous growth at the regional airports. In fact, eight out of ten new air travelers in New England have chosen the regional airports over Logan Airport. The regional airports are expected to accommodate an increasing share of the overall growth in air travel demand within the greater Boston area. This will provide some relief to Logan Airport. Nevertheless, the proposed Airside Project is necessary and provides clear benefits at current traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of growth at the regional airports, including capital improvements and traffic growth.
85.15	Noise	Fleet Mix	Massport should evaluate increase in "equivalent jet operations."	Refer to Appendix C of the Supplemental DEIS/FEIR for equivalent jet operations by project alternative.
85.16	Alternatives	Runway 14/32	Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations at Logan directly, because of delay reduction.	<p>Implementation of the elements of the recommended Airside Project, specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport.</p> <p>The runway will substantially reduce the delays that now occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable, and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred without the runway. Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. Refer to the discussion in Section 4.2 in the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
85.17	Alternatives	Demand	This project and landside projects at Logan are interdependent, and both will increase capacity and stimulate demand.	The Airside Project has independent utility from existing and proposed landside projects at Logan Airport. The proposed Airside Projects at Logan Airport are designed to improve airport efficiency and better accommodate current and future levels of demand. Long-term growth in air travel demand is a recognized worldwide phenomenon that results from economic and demographic growth. Massport has no control over the underlying determinants of aviation growth. The construction of unidirectional Runway 14/32 would prevent the significant drop in airfield capacity that now occurs during northwest wind conditions. The runway will not increase Logan Airport's normal operating capacity of approximately 120 operations per hour which is available nearly 80 percent of the year. The runway does not induce or stimulate new traffic that would otherwise not occur at Logan Airport.
85.18	Ground Transportation	Access to Logan Airport	Massport's proposal to increase the percentage of passengers accessing Logan Airport who do so in high-occupancy vehicles falls far short of absorbing the full projected increase in passenger ground access requirements.	The <i>Logan Airport 1999 ESPR</i> (previously GEIR) which was filed December 15, 2000, examines the feasibility of reaching a higher target percentage for air passenger HOV ridership than 35.2 percent when annual air passengers reach 37.5 million.
85.19	Alternatives	Runway 14/32	There can be no guarantee of "unidirectional use" of Runway 14/32.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only - i.e., all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from Runway 14 heading out over Boston Harbor. State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Appropriate supporting documentation will also be issued (e.g., appropriate designations in the Airport/Facility Directory, and Notices to Airmen or NOTAMS).</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of Runway 14. The location of the Hyatt Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow for maximum use of over-water operations which would thereby limit operational impacts over residential areas. To reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. It is anticipated that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p>

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85.20	Noise	PRAS	... airfield operations are unlikely to attain, and even less likely to sustain, the progress toward attainment of PRAS goals that Massport projects.	During very high demand periods, the controllers have little or no flexibility for runway selection and PRAS recommends an appropriate runway configuration given the extant demand. Unidirectional Runway 14/32 would give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals. The Supplemental DEIS/FEIR demonstrates that the controllers have been improving performance with respect to PRAS recommendations. Section 8.5 of the Supplemental DEIS/FEIR contains methods for more comprehensive monitoring of PRAS. These methods will be implemented as part of the mitigation program for the Airside Project.
85.21	Noise	PRAS	PRAS goals may well no longer represent community consensus.	The PRAS goals were established after community input in the 1980s. The goal of PRAS was to distribute noise equitably, based on demographic considerations. As demonstrated in the Supplemental DEIS/FEIR, there have been no significant demographic changes since the time of the establishment of the PRAS goals. An update of the PRAS goals is therefore not warranted. Furthermore, the Supplemental DEIS/FEIR also demonstrates the more equitable balance of noise impacts among communities surrounding Logan Airport that can be achieved with the Preferred Alternative as opposed to the imbalance that occurs today and would occur in the future if no action is taken.
85.22	Noise	Fleet Mix	Most of the projected increases in passenger demand will be met by increased operations of the "passenger jet" fleet. This of course is the fleet that creates the noise impacts at Logan and elsewhere.	The operations forecast accounted for passenger growth and how that growth would be accommodated within a range of future fleets. The noise analysis reflects the impacts associated with these fleets. Refer to Chapter 6 of the Supplemental DEIS/FEIR.
85.23	Noise	Runway Use, PRAS	There will be significant increases in overflights of East Boston, Chelsea, Everett and other "15/33" communities, and of South Boston, South End, Roxbury and other Runway 27 communities.	The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain essentially the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts. Total departures from Runway 33L and arrivals to Runway 15R (over East Boston and Chelsea) would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below the annual goals for these operations. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.
85.24	Noise	Hushkitted Aircraft	Massport overstates the benefit of further conversion to Stage 3 aircraft on future noise levels around Logan Airport.	The study does not overstate the benefit of further conversion to Stage 3 aircraft on future noise levels. It uses two fleet scenarios in which almost all aircraft meet Stage 3 requirements, either as hushkitted Stage 2 aircraft or new Stage 3 aircraft, and three fleet scenarios in which all the aircraft meet Stage 3 requirements. Most of the aircraft are new high-bypass, engine-powered Stage 3 aircraft. Many of the hushkitted aircraft have been retired.

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85.25	Noise	Nighttime Noise	The number of nighttime jet operations can be expected to double within the foreseeable future under conservative forecasts. The noise impacts of this increase are huge, and are not mitigated by use of Stage 3 aircraft since night operations are now required to be only of that type.	<p>Table 6.2-17 of the Supplemental DEIS/FEIR shows nighttime jet operations projected to increase from 106 in 1998, to as many as 259 under the No Action Alternative with the 2015 High Regional Jet Fleet. However, regardless of the fleet, many of the future night operations are the result of delays that will occur as demand at Logan Airport continues to increase. One of the direct benefits of the Preferred Alternative is that it will reduce these night operations by 32 to 43 flights depending on the fleet forecast, though any alternative to the No-Action scenario will help alleviate some of the projected delays.</p> <p>In addition, Massport is committed to exploring other measures to reduce nighttime noise whether or not the Preferred Alternative is implemented.</p>
85.26	Noise	Nighttime Noise	An alternative that should be considered is the creation of a cap on nighttime operations pursuant to FAR Part 161.	Since a low level of flight operations occurs during nighttime hours, very few delays occur during these hours. Therefore, eliminating night flights would not be a viable alternative as a delay reduction measure.
85.27	Noise	Runway Use	A significant number of flights did not conform to the published departure tracks, and re-crossed the shoreline over Hull and were also below 6,000 feet.	Comment noted.
85.28	Noise	Sound Insulation	We disagree with the statement, "After sound-proofing to mitigate impacts within the 65 DNL Contour, the full-build alternatives provide net long-term benefits."	<p>Long-term benefits are derived from reduced delays, increased achievement of PRAS goals, and the reduced numbers of people exposed to the highest noise exposure levels. Each of these benefits becomes more substantial as aircraft operations are projected to increase over time. Refer to, for example, the comparison of exposed populations presented in Table 6.2-3 of the Supplemental DEIS/FEIR.</p> <p>Sound insulation reduces noise inside the home. While the implementation of the Preferred Alternative would bring additional homes within the criteria for inclusion in the sound insulation program, the inside of these homes will have lower noise levels than they would have had without sound insulation under the No Action Alternative.</p>
85.29	Noise	Sound Insulation	Concerns about Massport's residential "soundproofing" program include the pace of the program, the failure to provide air conditioning in conjunction with the "soundproofing" program, and the small number of dwelling units that are eligible for the program.	<p>By the end of the 2000 construction season, Massport sound insulated approximately 3,400 residential buildings containing about 6,000 dwelling units, constituting one of the largest sound insulation programs in the country. Construction over the last seven years has proceeded at the rate of 550 to 800 dwelling units per year. Mitigation of noise impacts from the Preferred Alternative is estimated to add up to 1,450 units to the program. At current construction rates, that work could be complete in approximately two years.</p> <p>FAA policy regarding sound insulation programs requires that "positive air ventilation" be provided in conjunction with sound insulation treatment so that windows may be left closed during all seasons to maintain adequate noise reduction. The Massport residential sound insulation program is designed to comply with this requirement.</p>
85.30	Noise	Sound Insulation	FAA Order 5100.38A makes ineligible for AIP funding any non-related code-required building improvements necessary to accommodate acoustic treatment improvements. This may impose significant burdens on some property owners.	Federal requirements typically exclude the FAA from any responsibility to bring a building up to code when the structure is sub-standard but otherwise qualifies to participate in an airport-sponsored sound insulation program. However, to address impacts in particular projects such as the proposed Airside Project, FAA has discretion to use grant funds to bring buildings up to code as part of this mitigation program to the extent such improvements are required to proceed with the sound insulation work. The mitigation program for the Airside Project includes use of grant funds for such purposes.

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85.31	Air Quality	Odor	The proposed Airside Improvement Project provides minimal long-term air quality benefits. Changes in air quality associated with the proposed project are likely to be undetectable, with the exception of adverse odor impacts. There is potential for adverse odor impacts in certain areas proximate to the airport, as a result of this project. Changes in odor impacts are most likely to occur in the Jeffries Point neighborhood from takeoffs on Runway 14.	The Airside Project leads to a decrease in odor-causing hydrocarbon emissions, when compared to the No Action Alternative. This is illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR. However, decreases in odorous emission concentrations will be imperceptible.
85.32	Air Quality	Odor	The odor modeling and odor impact assessment procedure is inadequate.	Neither the EPA nor the FAA provides specific requirements, guidelines, or standards for assessing odors at airports. The modeling of odor-causing hydrocarbons was used as a surrogate in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. The results are used as an indicator of odor-causing compounds.
85.33	Air Quality	Impacts	For all modeled contaminants other than VOCs, the difference (if any) among Airside Improvement Project alternatives is much less significant than the projected growth of emissions over time.	The growth in emissions over time will occur with or without the Airside Project. However, the Preferred Alternative presents a significant decrease in emissions compared to the No Action Alternative.
85.34	Air Quality	Model	Massport should have used the ten-year hourly average meteorological input for the air quality dispersion model, and should be required to rerun to dispersion model for all of the conditions modeled for the DEIS/DEIR.	In accordance with EPA, MDEP, and FAA modeling guidance, DELAYSIM uses ten years of weather data, not an average of ten years of data. These data were obtained from the National Climatic Data Center. Also, the air quality dispersion model that was used complies with EPA and FAA standards.
85.35	Ecosystems	Rare Species	A program is required to compensate for impacts to the nesting habitat on Logan Airport of the state-listed endangered upland sandpiper. The suggested program appears highly speculative as described. Massport should be required to set forth the resolution with NHESP in the DEIS/DEIR.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport associated with construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far in excess of the 40± acres to be lost at Logan Airport. A Memorandum of Agreement will be signed between Massport and the Massachusetts Army Air National Guard for implementation of the program.
85.36	Construction	Mitigation	Massport has failed to demonstrate how fugitive dust emissions from construction operations on the airfield will be controlled during winter months.	Construction-period air quality impact mitigation will include the steps specified in FAA Advisory Circular 150/5370-10A, Standards for Specifying Construction of Airports. These and other measures are listed in Section 8.5.2 of the Supplemental DEIS/FEIR.
85.37	Construction	Noise	Shortcomings of the Massport construction noise analysis include its failure to address the matter of pure tones and of impact noise (i.e., paving breakers and hoe rams), and the failure to separate out and separately analyze nighttime construction noise levels against nighttime ambient levels. The noise criteria applied by Massachusetts Department of Environmental Protection are applicable to this project.	The analysis of nighttime construction noise levels does not show any significant impact from construction noise, since no pure tone noise is allowed to be emitted from construction equipment such as back-up alarms, as specified in Massport's construction mitigation guidelines.
85.38	Noise	Sound Insulation	We disagree with the statement, "After sound-proofing to mitigate impacts within the 65 DNL Contour, the full-build alternatives provide net long-term benefits."	Refer to response to Comment 85.28.
85.39	Environmental Review Process	FAA/NEPA	Federal planning policy establishes that this project must be considered and evaluated as <u>stimulating growth in aircraft operations</u> at Logan.	Refer to responses to Comments 85.1, 85.16 and 85.17.

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85.40	Analysis Assumptions	Forecasts	The planning period is inadequate, and should be extended to 2020. There is no plan or program to deal with long-term growth at Logan, which will soon overwhelm any interim benefits of this project.	Massport has developed a range of potential future traffic levels for planning purposes. For a variety of reasons, Massport believes that the forecasts described as 1999 and 2010 projections in the <i>Logan Airside Improvements Feasibility Study, Phase I Report</i> and the <i>DEIS/EIR</i> will not be achieved until after 1999 and 2010, respectively. The Airport is likely to reach 29 million passengers (formerly the "1999" forecast) in 2003. Developments at the regional airports and Amtrak's high speed Acela Express rail service to New York are expected to further slow Logan Airport's passenger traffic growth. As a result, Logan Airport is now expected to reach 37.5 million passengers in 2015 and 45 million passengers in 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period that extends beyond 2020. Refer to Chapters 1 and 4 of the Supplemental Draft EIS/Final EIR for a complete discussion of the planning forecasts.
85.41	Purpose and Need	Delays	Delay does not appear to be a major problem at Logan, based on Massport's two-year history of inaction and on FAA analyses.	Refer to response to Comment 85.4.
85.42	Environmental Review Process	MEPA	The DEIS/DEIR should be found inadequate ...	Refer to response to Comment 85.12.
85.43	Analysis Assumptions	Forecasts	The airside project and the landside projects at Logan are interdependent, and both will increase capacity and stimulate demand.	Refer to responses to Comments 85.1, 85.16 and 85.17.
85.44	Delay	Model	Background information on the development of these models [FLAPS and DELAYSIM] is not presented, as required by FAA.	FLAPS and DELAYSIM have been discussed in Section 4.4 of the Supplemental DEIS/FEIR. These models were originally developed for Logan Airport under Massport and FAA funding, and have been used in airport planning studies in the United States and internationally.
85.45	Delay	Model	Massport did not use the FAA-approved SIMMOD model for the airport simulations, but chose to develop its own model for estimating delay.	The Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of computer models for estimating flight delays, including their limitations. SIMMOD is not well suited for conducting the long-term delays analysis that DELAYSIM provides for the Airside Project study. FAA reviewed and approved the simulation models used in this study.

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85.46	Delay	Model	The delay hours projected by Massport are the artifacts of its own model, severely overstate the actual situation, and do not comport with the FAA's procedure for calculating delay at airports.	<p>Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.</p> <p>The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...."</p> <p>The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.</p>
85.47	Noise	PRAS	The DELAYSIM model should use as the leading criteria the highest capacity configuration and air traffic controller workload weighting approved by FAA ATC.	The FAA has signed a MOU with Massport to follow PRAS recommendations, when feasible. Implementing a maximum capacity policy would ignore the agreement for equitable distribution of noise among the surrounding communities, and cause use of the northeast-southwest runways to grow to 70 percent or higher. The workload weighting factor used in DELAYISM was developed in conjunction with FAA ATC.
85.48	Delay	Model	The report compares Massport's calculation of delay with FAA's calculation of delay. This comparison throughout the DEIS/DEIR is incorrect and misleading.	Refer to response to Comment 85.46.
85.49	Delay	Model	The FAA data on delays cited elsewhere in this report shows that the delay situation at Logan has improved since 1993 and is essentially in equilibrium ... The DEIS/DEIR does not reflect this information.	Refer to response to Comment 85.4.

Code	Topic 1	Topic 2	Comment	Response
85.50	Delay	Model	Modeled delay under the most optimistic Massport scenario will return to present levels within a very few years and increase after that. The stimulation of demand is not reflected in the annual hours of delay calculations.	<p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate <i>and long-term</i> benefits by lowering runway delays by 38,000 hours under 1998 conditions, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. The sooner airside efficiencies are implemented, the more benefits will accrue over time.</p> <p>The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used during high demand periods. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce delays that occur during northwest wind conditions, and will represent a real benefit to the passengers and airlines that currently experience them. However, these wind conditions and the associated delays are not predictable and cannot be anticipated, so Runway 14/32 will not stimulate growth in Logan Airport passenger demand above the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the airside operational and environmental analyses would capture any potential variation in future passenger and aircraft activity at Logan Airport.</p>
85.51	Alternatives	Runway 14/32	While peak hour capacity does not increase with construction of the runway, the additional runway will provide the controllers the option to use higher-capacity configuration more of the time. This ability is providing additional "throughput" of aircraft operations.	Runway 14/32 would correct an airfield deficiency in the northwest operating direction by increasing the capacity of that configuration closer to the airport's normal operating capacity of 120 operations per hour.
85.52	Environmental Review Process	FAA/NEPA	Massport has not met the requirements of the National Environmental Policy Act ... No discussion of "alternatives not considered in this DEIS/DEIR" was included.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to FAA scoping directives, applicable FAA environmental orders and all other NEPA requirements.
85.53	Regional Transportation	Regional Airports	DEIS/DEIR should include development of a new airport.	Refer to response to Comment 85.9.

Code	Topic 1	Topic 2	Comment	Response
85.54	Alternatives	Other Non Construction Alternatives	DEIS/DEIR should include Consideration of Implementing a High-Density Rule (Slots)	Neither federal nor state scoping directives required an analysis of slotting. Imposition of slot controls constitutes a federal policy that has been preempted to the FAA under federal law and is not within Massport's jurisdiction. Congress determined that the slot program has a number of significant problems. The U.S. DOT has studied options for reducing slot controls at airports. As a result, the AIR-21 Act, which was enacted in March 2000, eliminates all slots at three of the nations slot controlled airports. Slots at the Chicago O'Hare airport will be eliminated by July 1, 2002 and slots at New York LaGuardia and New York JFK will be eliminated by January 1, 2007. PPP represents a market approach that should encourage the highest value services to use Logan Airport during periods of scarce capacity without the market disruption and other inefficiencies related to slot control.
85.55	Noise	Nighttime Noise	DEIS/DEIR should consider implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions for Stage 2 and Stage 3 operations at Logan to provide noise relief to affected communities. A specific measure that could be considered is a cap on nighttime operations.	The phaseout of Stage 2 aircraft operations was complete as of December 31, 1999. Refer to response to Comment 85.26.
85.56	Regional Transportation	Regional Airports	The New England governors, the FAA, and the Federal Highway Administration must assist state government and the Boston area communities in devising and implementing programs to ensure that Massport's numbers grow no larger, while not inhibiting normal beneficial economic growth of Eastern New England. The Airside Improvement Project must be viewed in this larger regional context.	While Massport has no jurisdiction over the development, operation or use of infrastructure at airports other than Logan Airport, Hanscom Field, and Worcester Regional Airport, Massport is engaged in promoting the use of other alternative regional airports and travel modes to relieve traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci sponsored a Regional Transportation Summit that involved the New England Governors, transportation officials, and business leaders. The summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.
85.57	Regional Transportation	Regional Airports	Massport argues that the growth in passenger traffic experienced at the Manchester, New Hampshire Airport and the T.F. Green Airport in Warwick, Rhode Island represents shifts of demand from Logan Airport. It is equally likely that the introduction of those two airports of low-cost carriers has stimulated overall regional air travel growth, the bulk of which has been absorbed at those two airports.	Until Southwest Airlines, Delta Express and MetroJet introduced low-fare services into the region, the New England region had been one of the only regions in the United States without a significant low-fare carrier presence. The resulting stimulation of traffic at the regional airports consists of both induced demand and diversion from Logan Airport. This diversion results from a recapture of traffic within Manchester and T.F. Green/Providence airports primary markets that was previously using Logan Airport. The slowing of Logan Airport's growth rate is a clear indication that the new services at the regional airports have diverted traffic from Logan Airport. The induced demand resulting from Southwest Airline's low cost service is being accommodated at the regional airports and not at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
85.58	Regional Transportation	Regional Airports	If market forces are left to drive growth in traffic at those airports, growth at Logan will not be significantly constrained. Specific goals would have to be established, and a series of measures implemented to stimulate a substantial shift of traffic demand from Logan.	Market forces have been responsible for the shift in airport usage from Logan Airport to the regional airports. Since 1996, when low-fare services were first established at T.F. Green/Providence Airport, eight out of ten new air travelers in New England have chosen to use the regional airports over Logan Airport. Regional airports have become attractive alternatives to Logan Airport because of airline decisions to increase the frequency and quality of regional airport services (i.e., jet versus turboprops), the availability of lower airfares, convenient access relative to Logan Airport, and increased public awareness of the regional airports. Given this situation, growth is expected within Logan Airport's primary service area that will now shift to Manchester or T.F. Green/Providence airports.
85.59	Regional Transportation	Regional Airports	Although Massport includes some off-airport options, the development of other obvious alternatives has not been reasonably discussed nor have the reasons for their elimination as options.	The discussion of alternatives in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR responds to federal and state scoping directives and provides appropriate analytical context for assessing the need for the Preferred Alternative.
85.60	Regional Transportation	Regional Airports	The conclusion of the MAC Second Major Airport Study points out that long-term considerations to meet increasing demand require that a second airport (either a greenfield airport and/or significant expansion of an existing airport) be an alternative to the improvements recommended.	Refer to response to Comment 85.9.
85.61	Alternatives	Peak Period Pricing	Peak Period Pricing is but one form of economic incentive or control that should be considered in evaluating measures to reduce airspace and airfield congestion.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. Additional analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR. This analysis includes the High Fleet scenario. Demand management measures at other United States and international airports are discussed in Section 3.5. For a review of demand management policies at other U.S. and international airports, refer to Section 3.5 of the Supplemental Draft EIS/FEIR.
85.62	Alternatives	Peak Period Pricing	The basic assumption was made that peak period pricing needed to be revenue neutral, pertaining only to airfield revenue and airfield costs at Logan. This assumption resulted in impacts to airlines that operate small aircraft only.	The PPP program evaluated in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR was designed to comply with pertinent U.S. DOT and federal court precedent in the PACE proceedings and with existing federal regulations regarding airport rates and charges. Revenue neutrality was incorporated in the tested program for this reason. Massport's prior experience with the PACE landing fee structure demonstrates that changes to the existing weight-based landing fees will undergo thorough legal and regulatory review, and that the program must be carefully structured to withstand this process. This was examined in developing the illustrative program.
85.63	Alternatives	Peak Period Pricing	Consideration should be given to a quite different approach to addressing the efficiency of Logan Airport during peak operating periods and in carrying out its primary mission.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives.</p> <p>The application of a fixed peak period surcharge corresponds to the Citizens Advisory Committee's recommendation that an appropriate demand management program provide mechanisms to encourage the use of larger aircraft at higher load factors. Flights carrying greater numbers of passengers will minimize the cost per passenger impact of the surcharge.</p>

Code	Topic 1	Topic 2	Comment	Response
85.64	Alternatives	Peak Period Pricing	Massport's model for peak hour pricing has chosen too narrow a definition of the regulatory criteria it must meet to establish a peak hour pricing structure.	Refer to response to Comment 85.62.
85.65	Alternatives	Peak Period Pricing	The range of options considered for Peak Period Pricing is insufficient.	The Airside Project analysis of PPP examined an operations threshold of 110 operations per hour, which is already below Logan Airport's normal operating capacity of 120 operations per hour. There is no legitimate operational justification for imposing a peak period surcharge at an operation level significantly lower than Logan Airport's normal operating capacity which is achieved 80 percent of the year without any delays. Even at 75 operations per hour, Logan Airport would be subject to delays from northwest wind conditions. The Airside Project analysis in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR indicates that, with the Preferred Alternative, Logan Airport can accommodate existing and foreseeable future levels of demand without imposing a drastic administrative restriction to artificially revise Logan Airport's existing capacity.
85.66	Alternatives	Peak Period Pricing	The option of utilizing "costing" (including peak period pricing) approaches for the purpose of delay reduction should be retained. It should be the first option selected for implementation, as a non-capital intensive, adjustable measure to move toward a goal.	Analysis of PPP is set out in Section 4.5 of this Supplemental DEIS/FEIR.
85.67	Regional Transportation	Diversion	A shift away from air travel through reliance on other means of travel or communication is essential. Vigorous measures to foster and encourage this shift should be undertaken by State government in cooperation with Amtrak and telecommunications providers.	The acceptance of videoconferencing and other means of telecommunications by businesses as a substitute for air travel are largely dependent upon the quality of the available technology and private sector decisions outside the authority of FAA and Massport. Massport encourages such initiatives from state government, Amtrak, and others. Massport forecasts in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR took account of the likely effect of such factors as videoconferencing over the forecast period.
85.68	Environmental Review Process	FAA/NEPA, MEPA	The DEIS/DEIR does not indicate the requirement of a benefit-cost analysis.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives. According to 40 CFR Part 1502 Environmental Impact Statements Regarding Cost-Benefit analysis "for purposes of complying with the act, the weighing of the merit and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis..."
85.69	Noise	Studies	There are no economic analyses of the noise impacts regarding the various alternatives.	Analysis of noise impacts of the various airside alternatives was performed and is described in Chapters 6 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. The noise analysis complies with federal and state scoping directives on the Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR.
85.70	Environmental Review Process	FAA/NEPA	No indication of how the project is to be financed is provided . . .	The Airside Project is programmed into Massport's standard five-year capital budget process. An appropriate financing plan, including AIP funds and other grant funds, will be developed at the time the project is ready for financing. Sufficient funds will be available to complete the project.
85.71	Alternatives	Preferred Alternatives	Full impact of FAA not issuing a "Modification of Standards" for Layout Option C needs to be discussed.	A Determination of Acceptable Level of Safety, not a Modification of Standards, is required from FAA for Option C.
85.72	Alternatives	Runway 14/32	The commitment to maintain Runway 14/32 as a unidirectional runway is clearly reversible.	Refer to response to Comment 85.19.

Code	Topic 1	Topic 2	Comment	Response
85.73	Alternatives	Runway 14/32	Massport indicates that only regional and commuter aircraft will use the proposed runway. The Airport Reference Code (C-III) for the proposed runway includes the following aircraft types: Airbus A-320s, BAC 111s, Boeing 727s, Boeing 737s, Fokker F-28s, and MDC DC-9s. Therefore, large jets can and will use the runway.	Design Category C-III indicates the highest approach speed and widest wingspan of the aircraft to use the runway. Approach Category C includes those with speeds from 121 to 140 knots. Design Group III designates wingspans from 79 to 117 feet. Several of the general aviation and commuter aircraft have approach speeds or wingspans in these classes. Most of the types cited in this comment are Stage 2 aircraft that were phased out of service in 2000. Required runway takeoff and landing distances would prevent most of these aircraft operations on Runway 14/32. For operating efficiency, FAA controllers would keep the large jets on Runway 33L and the smaller aircraft on Runway 32.
85.74	Alternatives	Taxiway Improvements	The summary of advantages cited for the Centerfield Taxiway supports the community concern that the presence of the Centerfield Taxiway will make the use of the 4/22 runway combinations more attractive ...	The taxiway improvements are designed to improve ground movement efficiency and safety, and to reduce taxiing delays, thereby reducing associated noise and emissions. Section 3.3 of the Supplemental DEIS/FEIR describes several operating situations that would benefit from these improvements. Unidirectional Runway 14/32 would allow more evenly distributed runway use, reducing the use of the Runways 4/22 from 60 to 70 percent to 35 to 40 percent. When using Runways 22L/R for departures, the Centerfield Taxiway would be used for Runway 22L departures to bypass the queue for Runway 22R.
85.75	Alternatives	Peak Period Pricing	Massport is not including Alternate 1 as the preferred alternative, which according to its model provides the highest reduction in delay.	The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. Analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR.
85.76	Alternatives	Peak Period Pricing	The peak period pricing option or an alternative congestion approach should be implemented immediately to gain its delay-reduction benefits throughout and beyond any construction period.	Refer to response to Comment 85.66.
85.77	Air Quality	Odor	There are adverse air quality impacts associated with construction of Runway 14/32 and the Centerfield Taxiway that are not sufficiently explored in the DEIS/DEIR. These include odor impacts, especially in the Jeffries Point area, and potential construction dust problems.	Section 6.4 of the Supplemental DEIS/FEIR contains a thorough analysis of adverse air quality impacts. There are no anticipated odor-causing operations during the construction process. Fugitive dust from construction will be minimized by using methods described in FAA Advisory Circular 150/5370-10A, Standards for Specifying Construction of Airports.
85.78	Ecosystems	Rare Species	A major element of the proposal to mitigate impacts on the state-listed upland sandpiper, that of creation of a replacement habitat on Cape Cod, appears to ignore geography and is of questionable benefits.	Refer to response to Comment 85.35. In addition to shifting Upland Sandpiper habitat areas at Logan Airport from proposed construction sites to other grassland areas on the airfield, Massport has worked closely with NHESP to develop an off-site habitat enhancement plan for this species. The individual birds that use the airfield are part of a larger Upland Sandpiper population in Eastern Massachusetts. The proposed off-site habitat enhancement program will significantly improve regional opportunities for Upland Sandpiper and restore habitat for the declining population at Camp Edwards on Cape Cod. The on-site mitigation program is designed to maintain the existing population.
85.79	Alternatives	Runway 14/32	The commitment to maintain Runway 14/32 as a unidirectional runway is clearly reversible.	Refer to response to Comment 85.19.

Code	Topic 1	Topic 2	Comment	Response
85.80	Alternatives	Runway 14/32	... this project sends [the signal] that Massport continues to be committed to expansion of Logan Airport ...	The Preferred Alternative is a delay reduction program that promotes the efficiency and safety of airfield operations at Logan Airport. Runway 14/32 enhances operating efficiency by providing a third available runway in weather conditions that require northwest-southeast operations. Similar three-runway configurations exist for all other operating directions. Runway 14/32 would not expand the overall capacity of the airport, since Logan Airport's normal operating capacity of 120 operations per hour, which is available approximately 80 percent of the year, is maintained with Runway 14/32. Massport is committed to ensuring that the airfield continues to function as efficiently as possible. The Preferred Alternative achieves this goal responsibly.
85.81	Alternatives	Preferred Alternatives	Alternate No. 3 provides delay reduction without the build option. Alternate No. 2 provides significant delay reduction by allowing maximization of existing airfield capacity through the construction of a parallel taxiway. These two alternatives appear to be the most viable for the community.	The Preferred Alternative contains the elements of Alternatives 2 and 3. The elements contained in Alternatives 2 and 3 are each part of the long-term delay reduction strategy for Logan Airport. However, only the proposed unidirectional Runway 14/32 addresses delays caused by northwest winds and the corresponding reduction in airfield capacity that occurs in this operating direction.
85.82	Analysis Assumptions/ Methodologies	Planning Period	... the DEIS/DEIR document should indicate: a) what the long-term (20-year) needs are.	The analysis in Chapters 4 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR clearly indicate that airside delays and congestion at Logan Airport will worsen over the long term (ten- to 20-year time frame) if no actions are taken. The Preferred Alternative is designed to address the long-term need to reduce future growth in airside delays.
85.83	Purpose and Need	Delays	... the DEIS/DEIR document should indicate: b) how the alternatives considered meet these [long-term] needs.	Refer to response to Comment 85.82 and Section 4.6 of the Supplemental DEIS/FEIR.
85.84	Environmental Review Process	MEPA	Logan was constructed into a residential setting. The history of the airfield at Logan is noted in Appendix B but does not point out the residential development existing during the phases of development.	Comment noted. All planning efforts for Logan Airport, including the Airside Project, that are the subject of this environmental review take into account impacts on affected residential areas.
85.85	Environmental Review Process	FAA/NEPA, MEPA	Massport for too long has been allowed to take a segmented approach, arguing that landside projects are designed to accommodate ground passenger handling; airside improvement projects are designed to accommodate aircraft handling; that neither generates traffic; and that Massport has no control over passenger and cargo growth.	Refer to response to Comment 85.1.
85.86	Regional Transportation	Diversions	There needs to be a reallocation of roles and responsibilities, a primary objective of which should be to significantly temper the adverse impacts of air and ground vehicle operations to and from Logan Airport.	Massport has a long-standing commitment to minimizing and where possible, mitigating, environmental impacts associated with Logan Airport. The <i>Logan Airport 1999 ESPR</i> (previously GEIR) discusses the status of Massport overall mitigation for the groundside and airside impacts of the airport. The ESPR was filed on December 15, 2000.
85.87	Analysis Assumptions/ Methodologies	Base Year	This project, initiated in 1995 with the filing of an ENF, uses 1993 as its "base year" for planning purposes ... The passage of over five years from the "base year," ... should require that 1998 and data therefore constitute the "base year" for this Planning Project.	Refer to response to Comment 85.3.
85.88	Analysis Assumptions/ Methodologies	Planning Period	... the project should be extended to a 20-year planning horizon, to 2020 ... Massport claims that there has been no change in schedule ... This is untrue.	Refer to responses to Comments 85.3 and 85.40.
85.89	Environmental Review Process	FAA/NEPA MEPA	... Massport and the FAA have not complied with the required timing of the DEIS/DEIR document.	Massport and FAA have complied with all applicable state and federal requirements.
85.90	Analysis Assumptions/ Methodologies	Base Year	... the analysis uses baseline data of 1993 for a document submitted in 1999. [Is not appropriate]sic	Refer to responses to Comment 85.3.

Code	Topic 1	Topic 2	Comment	Response
85.91	Delay	Model	The FAA data on delays cited elsewhere in this report shows that the delay situation at Logan has improved since 1993 and is essentially in equilibrium, <u>as assessed by the FAA</u> .	Refer to response to Comment 85.4.
85.92	Purpose and Need	Delay	Massport has clearly demonstrated, by its action placing this project on hold for nearly two years, that the problem is <u>not</u> "a matter of priority."	Delay is a current problem that is only going to worsen. Massport is committed to improving airfield efficiency and reducing delays. Refer to Section 4.6 of the Supplemental DEIS/FEIR for a discussion of how the Preferred Alternative reduces airfield-related delays at Logan Airport.
85.93	Regional Transportation	Cargo	The ENF Certificate required ... discussion of diversion of cargo to off-airport alternatives.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act..." Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The potential diversion of cargo operations was not specifically analyzed because cargo operations account for only two percent of aircraft activity at Logan Airport and since most all-cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport. However, all cargo operations were included in the future fleets analyzed in the Airside Project. Additionally, some cargo is now being diverted to regional airports as indicated by the strong growth in cargo services and air cargo activity at the regional airports.
85.94	Regional Transportation	Regional Airports, Passenger Rail	The ENF Certificate required consideration of...the off-airport alternatives as a separate scenario evaluated during the DEIS/DEIR.	The Secretary of EOE determined in the May 7, 1999 Certificate that the Draft EIR complied with applicable legal requirements. The certificate also provided a scope for the Final EIR in response to the May 7, 1999 scoping directives. Chapter 2 of the Supplemental DEIS/FEIR provides an evaluation of options to Logan Airport, regional airports and regional rail projects. These alternatives are expected to accommodate an increasing share of the region's overall growth in inter-city travel demand and provide relief to traffic growth pressures at Logan Airport. Nevertheless, the proposed Airside Project is necessary and provides clear benefits at current traffic levels. These benefits will only increase in the future, even as regional alternatives reduce the rate of future growth at Logan Airport.
85.95	Environmental Justice	Impacts	The ENF Certificate required consideration of ... the development of a second major airport in discussion of environmental justice.	Refer to response to Comment 85.9.
85.96	Delay	Model	The ENF Certificate required ... detailing of the existing delay derived directly from wind/weather and indirectly from delay at other airports.	The Secretary of EOE determined in the May 7, 1999 Certificate that the Draft EIR complied with applicable legal requirements. Refer to response to Comment 85.10.
85.97	Noise	PRAS	The ENF Certificate required ... documentation of history of PRAS and problems implementing it.	Refer to response to Comment 85.11.
85.98	Environmental Review Process	MEPA	... DEIR is submitted subject to Massachusetts' laws, policies and regulations, in addition to federal regulations and guidance. As such, it is subject to the determination of the Secretary of Environmental Affairs as to whether cumulative impacts have been adequately addressed.	The Secretary of Environmental Affairs determined in the Certificate on the DEIR, dated May 7, 1999, that the document complied with all applicable state requirements.
85.99	Environmental Review Process	MEPA	The Airside Improvement Planning Program is a short-range and limited response to a major concern about long-term trends, future growth, and increasing impact. The DEIS/DEIR does not address the long-term implication of growth.	Refer to response to Comment 85.82.

Code	Topic 1	Topic 2	Comment	Response
85.100	Analysis Assumptions/ Methodologies	Passenger Forecasts	In our opinion, the statement (page 7-3) that "The Airside Project has independent utility, and will not stimulate, preclude, or otherwise determine other development anticipated as part of Massport's landside planning effort" is incorrect. Massport argues the Airside Improvement Project is independent of the landside projects in every way. We disagree.	Refer to responses to Comments 85.1, 85.16 and 85.17.
85.101	Environmental Review Process	FAA/NEPA	The full implementation of the Airside Improvement Project ... <u>is expansion of capacity. Such as increase must be translated into a projected increase in demand,</u> as the FAA has stated in its regulations.	Refer to response to Comment 85.80.
85.102	Analysis Assumptions/ Methodologies	Planning Period	This DEIS/DEIR ... does not cover a sufficient planning period. Massport continues the fiction that 1999 is the near future and 2010 the far future. As a standard, FAA typically reviews and evaluates 20-year forecasts. ... No justification for using these short time frames was given.	FAA has no standard that requires a 20-year forecast. Refer to responses to Comments 85.3 and 85.40.
85.103	Analysis Assumptions/ Methodologies	Forecasts	The base year for the development of these forecasts is 1993. ... A more updated forecast for passengers at Logan in future 5, 10, and 20 years with high and low fleet scenarios should be provided for evaluation.	Refer to response to Comment 85.40.
85.104	Analysis Assumptions/ Methodologies	Base Year	... Massport cites significant changes since 1993 in the aircraft fleet mix; thus, the validity of the base year and high-range fleet forecasts are not appropriate for consideration in this analysis.	Consistent with the request made by the EOE in its Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. The High and Low Fleet scenarios for 37.5 and 45 million passengers represent a range of possible future activity—both levels and fleet mix—at Logan Airport.
85.105	Analysis Assumptions/ Methodologies	Passenger Forecasts	Massport should provide recent and relevant passenger forecasts for a 20-year period with associated operational forecasts using high and low fleet scenario assumptions that are consistent for all forecast years.	Refer to response to Comment 85.40.
85.106	Analysis Assumptions/ Methodologies	Passenger Forecasts	The DEIS/DEIR does not indicate the detailed methodology used to develop the levels of passenger forecasts presented. ... Massport must clearly identify the basis for the passenger demand projections, and must state the confidence level in those projections. Similarly, it must state the confidence level in the projections of diversion at each projected passenger level, and show the resultant range of passenger level projections.	The Airside analysis is based on a range of historic, current and future passenger levels. The Airside Project Draft EIS/EIR included the analysis of 1993 Historic Modeled Conditions with 24 million passengers. The Supplemental DEIS/FEIR was updated to reflect 1998 current conditions, i.e.: 26.5 million passengers. To account for the uncertainty associated with any forecasting effort, the Airside analysis considered a range of future passenger levels from 29 million (expected to be reached in 2003), to 37.5 million (2015), and 45 million (2024). Furthermore, the results of the Airside analysis indicate that the delay reduction benefits of the Preferred Alternative are not dependent upon the future forecast passenger level. As demonstrated in Section 4.6 of the Supplemental DEIS/FEIR, the Preferred Alternative would produce significant delay reduction at current, 1998 activity levels, as well as the wide range of current and future forecast passenger levels.
85.107	Analysis Assumptions/ Methodologies	Passenger Forecasting	The distinction between the "low operations fleet" and the "high operations fleet" is confused in the DEIS/DEIR.	As described in Chapter 4 and Appendix E of the Airside Project Draft EIS/EIR and in Section 4.2 of the Supplemental DEIS/FEIR, the high fleets are characterized by comparatively larger number and share of operations with smaller regional carrier aircraft, consistent with the three carrier network observed in the early 1990's. The low fleets exhibit fewer small aircraft and a larger average aircraft size at Logan Airport, resulting in fewer aircraft operations required to accommodate the specified number of passengers. The alternative fleet forecasts examined in the Airside analysis permitted Massport and the FAA to compare the relative merits of different improvement concepts against a wide range of current and potential future activity levels.

Code	Topic 1	Topic 2	Comment	Response
85.108	Noise	Fleet Mix	... the percentage distribution of passengers between "passenger jets" and "regional carriers" presented ... indicate that most of the projected increases in passenger demand will be met by increased operations of the "passenger jet" fleet. This is the fleet that creates the noise impacts at Logan and elsewhere.	Refer to response to Comment 85.22.
85.109	Analysis Assumptions/ Methodologies	Cargo	It should also be noted that cargo fleet operations in 1999 were held constant in both the "low fleet" and the "high fleet" projections ... the increased economic growth projection ... should also include a concomitant increase in the cargo jet operations forecast ... These corrections will affect the noise and noise impact forecasts of Chapter 5 and Appendix L.	Cargo activity at Logan Airport changes from year to year. Despite strong economic growth over the last few years, cargo operations at Logan Airport increased by less than two percent in 1999 and actually declined by 1.2 percent in 1998. Since cargo operations account for only two percent of aircraft activity at Logan Airport and occur during off-peak hours, cargo operations do not contribute to delays at Logan Airport. By reducing delays during the peak hours, the Preferred Alternative reduces the number of passenger operations that are delayed into the nighttime and thus reduces late night noise exposure for the surrounding communities.
85.110	Analysis Assumptions/ Methodologies	Planning Period	In our opinion, Massport should be carrying its projections a minimum of 20 years from a base year of 1998, for a draft environmental impact statement and report published in 1999.	Refer to responses to Comments 85.3 and 85.40.
85.111	Noise	Fleet Mix	Massport projects air traffic operations to increase substantially over the project planning period. ... A more important assessment is the projected increase in "equivalent jet operations," which ... approaches 50% over the next decade.	While equivalent jet operations increase by more than 50 percent from a 1993 base to the future 37.5M High Fleet scenario if the Preferred Alternative is implemented, the appropriate basis for comparison of the Preferred Alternative is the No Action Alternative. Equivalent jet operations would increase by more than 75 percent over the Preferred Alternative if no action were taken. Despite the increase in equivalent jet operations, the Airside analysis indicates that overall noise impacts decline over time with the elimination of Stage 2 aircraft and the replacement of hushkitted Stage 3 aircraft with non-hushkitted Stage 3 aircraft. By allowing aircraft operations to shift from over-land to over-water routings and by providing greater flexibility in the use of Runways 27 and 33L for takeoff, the Preferred Alternative further reduces the highest noise impacts to the close-in neighboring communities.
85.112	Ground Transportation	Access to Logan Airport	Massport proposes to increase the percentage of passengers accessing Logan Airport who do so in high-occupancy vehicles, but its proposal falls far short of absorbing the full projected increase in passenger ground access requirements.	The <i>Logan Airport 1999 ESPR</i> (previously GEIR) which filed on December 15, 2000, evaluates the feasibility of a higher target percentage for air passenger HOV ridership than 35.2 percent and discusses parking demand and management.
85.113	Regional Transportation	Regional Airports	A new class of much larger aircraft is under active development by several manufacturers. ... Their size and height, and the number of passengers, pose significant terminal problems. They are expected to require runways of about 11,000 feet in length. ... This therefore becomes another argument for the development of a major international airport serving New England that will have the capacity and capability to handle this generation of planes.	The Airside Project analysis is based on alternative 20-year forecasts of operations by aircraft type. Only larger aircraft compatible with the existing facilities at Logan Airport are included in the future forecasts for Logan Airport fleets on which the delay and environmental analyses are based. Also, refer to response to Comment 85.9.
85.114	Mitigation	Initiatives	These documents fail to address how Massport, the air transportation system, and the regional transportation and communication systems will cope with continued passenger and operations growth while simultaneously maintaining and improving environmental quality and quality of life, and an efficient transportation and communication system in the future.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPR</i> and its updates.

Code	Topic 1	Topic 2	Comment	Response
85.115	Noise	PRAS	Massport argues that the project "will not result in the division or disruption of established communities." This must refer solely to physical division or disruption, since Massport's promotional and political strategy has clearly been to effect division among the communities around Logan Airport. Some of these communities will be further disrupted by the short-term shifts in runway usage which are the basis for Massport's claims of "net benefits", all will be disrupted by further growth in Logan air operations over the near and far futures. Furthermore, this is the last possible physical project to increase Logan airfield capacity that could be undertaken <u>without</u> "division or disruption of established communities," or of the waters of and lands under Boston Harbor.	Projected changes in flight patterns and associated noise shifts are consistent with the PRAS goals, which were studied and approved by the community when established. Activity increases over certain communities are offset by activity reductions over other severely impacted communities and by activity increases over water.
85.116	Noise	Hushkitted Aircraft	Concerned that aircraft operations will continue to increase with the noise impact per operation unlikely to diminish.	The noise impact per operation is expected to diminish in the future for several reasons. The two largest airlines at Logan Airport, Delta Air Lines and US Airways are replacing their hushkitted shuttle fleets with full Stage 3 aircraft. US Airways took delivery of Airbus 320 aircraft in the fall of 1999 and Delta Air Lines has ordered Stage 3 Boeing 737-800s for its Boston to New York shuttle operations. By the end of 2000, approximately 24,000 annual operations were replaced by full Stage 3 technology aircraft.
85.117	Purpose and Need	Delays	It seems inevitable that Logan Airport will experience growing congestion, and with that congestion will come increasing pressure for additional measures to reduce it.	The Airside Project analysis shows that the Preferred Alternative will significantly reduce the growth in airside delays compared to the No Action Alternative. Refer to Section 4.6 of the Supplemental DEIS/FEIR. Massport will continue to examine ways to make Logan Airport more efficient.
85.118	Environmental Review Process	MEPA, FAA/NEPA	... The DEIS/DEIR should be found inadequate, ...	Refer to response to Comment 85.12.
85.119	Environmental Review Process	MEPA	The boundaries of the Airfield Study Area, Figure 5.1-2, should be extended to include the Hyatt Hotel and the waters to the east of Governor's Island, in order to include the runway safety areas and other protective envelopes.	The study area shown in Figure 5.1-2 of the Airside Project Draft EIS/EIR is intended to include all aircraft movement areas at Logan Airport.
85.120	Noise	Impacts	Concerned the 60 DNL contour does not include any areas of Milton/Quincy/Braintree, nor the town of Hull, whose residents are distressed by airport noise.	The Secretary of Environmental Affairs has requested that Massport examine noise exposure out to the 60 DNL contour. There is no evidence either from noise exposure contours or from measurements to suggest these communities experience noise greater than DNL 60. Also refer to Figure 5.2-3 and Table 5-6 of the <i>Logan Airport 1998 Annual Update</i> .
85.121	Noise	Impacts	The most salient observation is that "equivalent operations" will increase substantially over almost all areas over time. ... while the different alternatives slightly shift overflight impacts among communities, most residential areas will experience significant increases in impacts over time.	Refer to response to Comment 85.111.

Code	Topic 1	Topic 2	Comment	Response
85.122	Noise	Impacts	The plan to add another runway on the southern boundary of the airport will definitely alter the noise patterns for those south and southwest of the proposed runway....The South Boston and Jeffries Point areas will definitely have an increase in noise above 60 dB and possible above 65 dB. ... There is forecast to be an increase of five or more dB in approximately a three square mile area on the south shore of the Inner Harbor.	The only change in the shape of the noise contours from the addition of Runway 14/32 is the addition of a contour into the harbor in the general direction of the extended runway centerline (refer to Figures 6.2-5 through 6.2-14 in the Supplemental DEIS/FEIR). No increase is forecast for Jeffries Point (refer to Tables 6.2.4, 6.2.5, and 6.2-22 in the Supplemental DEIS/FEIR). Also, the Day-Night Sound Level for Noise Monitor No. 2 at B Street and Bolton Street in South Boston is expected to <i>decrease</i> (not increase) from 66.7 decibels (dB) in 1998 to between 63.4 and 64.5 dB with the 29M Low Fleet scenario, depending on the alternative; to between 58.7 and 63.8 dB with the 37.5M High Fleet scenario, and to between 58.1 and 63.0 with the High Regional Jet Fleet, depending on the alternative.
85.123	Noise	Model	Two sensor sites to the west-northwest of the airport are those at the Jeffries Point Yacht Club and at Summer, near [Lamson] in East Boston....According to the day-night contours in the analysis, the noise level would never reach 60 DNL. The Times Above Noise Levels (TANL) tables contradict these figures. ...	There is no contradiction between the tables of Day-Night Sound Level (DNL) values at the noise monitoring sites and the Time Above (TA) threshold values. The graphics in Appendix L of the D EIS/EIR and the new graphics in the Supplemental DEIS/FEIR (for example Figures 6.2-7 and 6.2-8 showing exposure levels for the 29M Low and 37.5M High fleets) indicate that both sensor sites (Sites 14 and A, respectively) are properly situated on or between the 60 and 65 DNL contours, their locations accurately matching the tabular values of DNL listed in Tables 6.2-10 and 6.2-11 of Supplemental DEIS/FEIR. Comparable comparisons also exist between the noise contours of Figure 6.2-12 and Table 6.2-26 of the Supplemental DEIS/FEIR for the 2015 High Regional Jet Fleet. However, the commentor appears to be confused over the difference between the DNL and Time Above noise metrics. The time-varying sound level of a passing aircraft can rise to a numeric value that exceeds a threshold of say 65 dB, then fall back below that threshold and in so doing will add several seconds to the Time Above noise metric. Yet that threshold exceedance does not mean the DNL value (a cumulative measure of exposure for a full 24-hour period) will be greater than 65 dB. Readers unfamiliar with these technical issues should refer to Section 5.2.3 of the DEIS/EIR, <i>Appendix G of the Logan Airport 1998 Annual Update</i> , or Appendix E of this document for background explanations of the noise metrics used in this evaluation.
85.124	Noise	PRAS	PRAS goals are advisory...We believe airfield operations are unlikely to attain, and even less likely to sustain, the progress toward attainment of PRAS goals that Massport projects. Therefore, the projected noise reduction "benefits" of the proposed project for the communities impacted by operations using the 4/22 Runways are not likely to be attained or, if attained, to be sustained.	Refer to response to Comment 85.20.
85.125	Noise	Hushkitted Aircraft	The number of nighttime jet operations can be expected to <u>double</u> within the foreseeable future under conservative forecasts. The noise impacts of this increase are huge. <u>All</u> nighttime operations of jets weighing over 75,000 pounds are required to be of Stage 3 aircraft, at this time. Therefore, the growth in numbers and percentage of nighttime jet operations <u>will not</u> be mitigated by the conversion to Stage 3 aircraft.	Refer to response to Comment 85.25.
85.126	Noise	Nighttime Noise	An alternative [to the projected increase in nighttime operations] that should be considered is the creation of a cap on nighttime operations pursuant to FAR Part 161.	Refer to response to Comment 85.26.

Source: *Journal of the American Statistical Association*, 1997, 92, 1037-1046.

Code	Topic 1	Topic 2	Comment	Response
85.133	Noise	Sound Insulation	Concerned that FAA eligibility rules makes ineligible for AIP funding any non-related code-required building improvements necessary to accommodate acoustic treatment improvements. <u>This may impose significant burdens on some property owners.</u>	Refer to response to Comment 85.30.
85.134	Noise	Sound Insulation	Another concern is the failure to provide air-conditioning in conjunction with the "soundproofing" program.	Refer to second paragraph of response to Comment 85.29.
85.135	Noise	Sound Insulation	A further concern is the eligibility of dwelling units for the program. At present, eligibility is determined by the location of the unit within the 65 DNL noise contour, as determined by the application of the Integrated Noise Model. Massport should consider whether other factors should be included in the determination of eligibility that might not be adequately captured by the use of the 65 DNL noise contours. Consideration should also be given to establishment of an interior noise level goal for the program regardless of location of the dwelling unit.	Massport has investigated possible hill effects to explain some larger differences at individual sites and plans to petition FAA for approval to modify the INM contours, where applicable. FAA policy on sound insulation already includes an interior design goal. FAA Order 5100.38 states "A 45 Ldn [DNL] within the major habitable rooms of a dwelling is considered the reasonable design objective for selecting noise attenuation measures". The policy also requires that a minimum of 5 dB of noise reduction be provided by a treatment to assure that the benefit will be noticeable.
85.136	Noise	Sound Insulation	The shortcomings of the INM [Integrated Noise Model] should be recognized and accommodated in the further development of the acoustic treatment program and with respect to eligibility for the program.... Credence should be given to the measured values in determining eligibility and design of corrective measures.	Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>). In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 5 of the <i>Logan Airport 1998 Annual Update</i>). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.
85.137	Noise	Sound Insulation	Want discussion on adequacy of school soundproofing program.	The Airside Project does not adversely affect any schools. In response to the SDEIS Panel, the Supplemental DEIS/FEIR includes a school day/school year contour.
85.138	Air Quality	Odor	Changes in odor impacts are most likely to occur in the Jeffries Point neighborhood from takeoffs on Runway 14...This would constitute a new source of odors in the Jeffries Point area and would also affect the Hyatt Hotel.	One-hour VOC concentrations (used as an indicator of odor) increase only slightly at Jeffries Point with the Preferred Alternative, when compared to the No Action Alternative. The predicted increase is so small that changes in odor will remain imperceptible, as measured against the No Action Alternative. Concentrations decrease at all other receptors with the Preferred Alternative.
85.139	Air Quality	Model	Increased use of Runway 15 for takeoffs can be expected to have an influence on odor impacts downwind of Runway 15 in the Bremen Street/Eagle Hill area of East Boston...An odor receptor location in East Boston representing the most proximate residential receptor located along or near the extended centerline of Runway 15R/33L should have been selected for odor modeling rather than Location 10 at the intersection of Condor and Glendon Streets.	Receptor No. 10 is representative of conditions in East Boston and is located near the runway centerline. East Boston is bracketed by the receptors placed at Receptor No. 10, at Eagle Hill, and at Jeffries Point.

Code	Topic 1	Topic 2	Comment	Response
85.140	Air Quality	Odors	The construction and use at the Centerfield Taxiway would change odor impacts in the Bayswater Street area of East Boston...[and] place taxiing aircraft closer to the Court Road section of Winthrop, where the odor impact would depend on the crosswind component during operations on Runways 4 and 22.	The emission inventory results show that the Airside Project, including the Centerfield Taxiway, would lead to a decrease in odor-causing hydrocarbon emissions, when compared to the No Action Alternative. This is illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR. The small changes in emission concentrations at Bayswater Street, East Boston, and Winthrop will meet federal standards for hydrocarbon emissions.
85.141	Air Quality	Odor	... the introduction of a new source [of odor emission] as in the case of Runway 14, is very likely to be detected, noted, and complained of. The same is probably true of an increase in frequency at which detectable odors are present, as could be the case for increased use of Runway 15 for takeoffs.	The Airside Project associated with Runway 14/32 would decrease overall odor-causing hydrocarbon emissions when compared to the No Action Alternative. This is illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR. The dispersion analysis indicates that the Preferred Alternative will have lower concentrations of odor-causing VOCs at all receptors other than at Jeffries Point. The minor increase at Jeffries Point is expected to be indistinct from the No Action Alternative.
85.142	Air Quality	Odor	Improvements in efficiency of ground taxi operations, while potentially yielding or resulting in reduction in odorous emissions generally on the airfield are not likely to be detected in the neighborhoods as reductions in odor intensity.	The Airside Project leads to a decrease in odor-causing hydrocarbon emissions, when compared to the No Action Alternative. This is illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR. Small changes in odorous emission concentrations will be imperceptible as measured against the No Action Alternative.
85.143	Air Quality	Impacts	The modeled increase in one-hour predicted levels of Volatile Organic Compounds ("VOCs") is of particular concern...It appears from the modeling results that the principal determinant of overall changes in VOC emissions would be the Taxiway Improvement Program. Runway 14/32 would have little impact...	Although VOC emissions increase over time because of increased aircraft operations activity at Logan Airport, emissions are lower with Alternatives 1 and the Preferred Alternative, when compared to the No Action Alternative. The decreases are attributable to both the proposed Runway 14/32 and the taxiway improvements.
85.144	Analysis Assumptions/ Methodologies	Base Year	The direct or indirect comparison of various alternatives to the baseline year 1993 is misleading. Conditions have changed substantially since 1993 in many respects, and emission rates for the various alternatives and for the various scenarios should be compared to 1998, the most current year for which operational data are available.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. The appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year.
85.145	Air Quality	Model	It is unclear why aircraft VOC emissions are not projected to increase with increasing numbers of aircraft operations. The KM Chng Environmental Study of 1996 reports that high-power operations may be significant sources of emissions of odorous compounds despite lower concentrations during that mode of operation, because of the high volume of contaminants discharged, yet this mode was not incorporated in the "odor emission" estimates.	Total VOC emissions increase with increased aircraft operations. However, low-thrust mode VOCs are reduced because of more efficient airfield operation (less delay). These emissions are most closely attributable to odor events.
85.146	Air Quality	Model	Massport should have used the same ten-year hourly average meteorological input for the air quality dispersion model [as was used for the DELAYSIM Model], and should be required to rerun the dispersion model for all of the conditions modeled for the DEIS/DEIR.	Refer to response to Comment 85.34.
85.147	Air Quality	Model	The use of the EPA Industrial Source Complex Dispersion Model utilizes too long an averaging time to adequately model peak odor concentrations...	A one-hour averaging time was used as the basis for all modeling results. This method is appropriate for estimating peak period concentrations.

Code	Topic 1	Topic 2	Comment	Response
85.148	Air Quality	Model	The modeling that was performed should be supplemented by the application of a "puff" model utilizing reasonable worst-case dispersion and dilution conditions and short-term peak emission rates, ...	Worst-case meteorological conditions have been modeled. Actual weather data and temporal aircraft distribution modeling were used to determine peak hours, days, and months of operations. Thus, true worst-case conditions have been modeled and supplemental modeling would not be instructive.
85.149	Air Quality	Model	No references are given for the assertion that newer engines associated with Stage 3 aircraft produce lower hydrocarbon emissions... Thus, the assertion that odorous emissions will decrease over time has not been substantiated.	Low-thrust mode VOCs are reduced because of more efficient airfield operation (less delay). These emissions are most closely attributable to odor events.
85.150	Ecosystems	Rare Species	The suggested program appears highly speculative... Massport should be required in the DEIS/DEIR to define a project fully acceptable to the Massachusetts Natural Heritage and Endangered Species Program that involves creation of a comparable habitat and its protection and preservation in the Metropolitan Area.	Refer to responses to Comments 85.35 and 85.78. Massport's program responds to directives from the EOEA and to its Natural Heritage and Endangered Species Program goals and guidelines.
85.151	Water Quality	NPDES permit	The presentation for minimizing water quality impacts during construction is completely inadequate and is substantively limited to the one paragraph on page 6-94.	Construction for Runway 14/32 and the Centerfield Taxiway would include excavation of unsuitable substrate, placement of clean new fill, and some regrading. Because of the flat topography on the airfield, erosion is more controllable than on more variable topography. As detailed in Section 6.9.4 of the Supplemental DEIS/FEIR, site-specific Stormwater Pollution Prevention Plans will be developed during design and as part of the NPDES construction permitting process. These measures will likely include siltation fencing, hay bales, sediment sumps, detention tanks, water quality monitoring and weekly Best Management Practices inspections.
85.152	Soil	Testing	Massport has performed no soil sampling and analysis in the principal areas of proposed excavation for the planned construction projects.	A sampling and analysis program to characterize soil conditions in potential construction areas was developed in support of the Supplemental DEIS/FEIR. The sampling and analysis involved the taking of 93 soil borings during July and August 1999 to determine both soil quality and structural characteristics. A summary of laboratory data and characterization of soils to be excavated is presented in Section 6.7.3 of the Supplemental DEIS/FEIR.
85.153	Soil	Reuse/ Disposal Options	Massport has indicated that the principal means of disposal of excavated material will be as landfill cover and contouring material. ... the Central Artery Project has substantially saturated the demand for materials for those purposes ...	Since filing of the Draft EIS/EIR, stockpiled materials at Governors Island have been moved off-site in response to a request from the receiver of the Rubchinuk Landfill in Middleton, Massachusetts. Section 6.7.4 of the Supplemental DEIS/FEIR describes this effort and identifies suitable reuse options for the remaining materials to be excavated.
85.154	Soil	Testing	... no assumption should be made about the chemical characteristics of the underlying material.	Refer to response to Comment 85.152.
85.155	Soil	Reuse/ Disposal Options	... management and disposal [of soil] is a significant program. The DEIS/DEIR treats this matter far too casually.	Refer to response to Comment 85.153.
85.156	Construction	Schedule	The statement that construction work with limited exception would only occur during the months of January, February and March, weather permitting, is puzzling. It is not consistent with Table 6.7-3; ... This matter needs to be clarified.	The only construction work proposed for the months of January, February and March is that associated with the demolition of Cargo Buildings 60 and 61. All other work associated with construction of Proposed Runway 14/32 and the taxiway improvements is proposed for the period of April through December.

Code	Topic 1	Topic 2	Comment	Response
85.157	Construction	Mitigation	Need to discuss construction worker access to site and related potential parking issues.	Runway and taxiway construction is similar to highway construction and is not labor intensive. As few as two and as many as 50 to 75 people would be working on the Airside Project construction at any one time, with an average of 15 to 20 workers on-site during a typical shift. By comparison an average of 15,000 non-construction employees work at Logan Airport on a daily basis. Parking on-site will be limited. Under Massport's construction period mitigation program, construction workers will be subject to a contractually required transportation management program. Workers are expected to commute to and from the construction site by using public transportation or high occupancy vehicles, such as shuttles or buses.
85.158	Construction	Air Quality	<u>Massport has failed to demonstrate how fugitive dust emissions from construction operations on the airfield during winter months will be controlled.</u>	Refer to response to Comment 85.36.
85.159	Construction	Mitigation	Wheelwash facilities generate considerable quantities of silt and sediment-laden water. Massport has not discussed how discharge of these contaminants will be controlled.	Wheelwash water will be discharged to grass areas on the airfield. This allows for the settling of sediments and the infiltration of water into the ground. Catch basins will be protected by silt fences or other suitable sediment barriers
85.160	Construction	Noise	Massport proposes to use the Federal FHWA Criteria for construction noise impact. Massport fails to recognize the criteria applied by Massachusetts Department of Environmental Protection, which limit construction noise increases to 10 dB(A) above background and prohibit pure tones as defined by DEP (DEP Policy 90-001). These criteria are applicable to this project.	The DEP identifies two criteria against which construction noise can be judged: it cannot increase ambient levels by more than ten dB, and it cannot produce a "pure tone" condition. Section 6.9.4 of the Supplemental DEIS/FEIR contains an analysis of construction noise with reference to these criteria. Refer to Comment 85.37.
85.161	Noise	Nighttime Noise	Other shortcomings of the Massport construction noise analysis are its failure to address the matter of pure tones and of impact noise and the failure to separate out and separately analyze nighttime construction noise levels against nighttime ambient levels ...	A discussion of nighttime construction noise levels has been included in the Supplemental DEIS/FEIR. The analysis of nighttime construction noise levels does not show any significant impact from construction noise.
85.162	Construction	Traffic	How will construction vehicles accessing or exiting via the North Gate be precluded from use of local streets?	The use of Neptune Road for <i>direct</i> connection to Route 1A (Northbound entrance ramp or southbound exit ramp) is the only portion of Neptune Road approved for contractor access or egress. This requirement will be contained within the contract specifications for the Airside Project.
85.163	Construction	Stormwater	The Soils Use Policy and the Stormwater Pollution Prevention Plan should be available for and subject to public review and comment.	The Massport Soil Use Policy and Stormwater Pollution Prevention Plan are available for review through the Massport Environmental Unit.
85.164	Noise	Sound Insulation	The statement is made, "After sound-proofing to mitigate impacts within the 65 YDNL Contour, the full-build alternatives provide net long-term benefits." <u>We disagree with this statement.</u>	Refer to response to Comment 85.28.
85.165	Air Quality	Odor	There is potential for adverse odor impacts in certain areas proximate to the airport, as a result of this project.	Odor impacts are generally lower with the Airside Project than without, as illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR.
85.166	Construction	Traffic	The statement expressing total peak construction trips as a percentage of the average annual daily traffic on the regional highway system is misleading, since most of the construction-related traffic consists of heavy vehicles.	Refer to Section 6.9 of the Supplemental DEIS/FEIR for an updated analysis of truck trips.
85.167	Environmental Review Process	FAA/NEPA	Federal planning policy establishes that this project must be considered and evaluated as <u>stimulating growth in aircraft operations</u> at Logan. The DEIS/DEIR makes a clearly contrary statement (page 7-3): ...	Refer to response to Comment 85.16.
85.168	Analysis Assumptions/ Methodologies	Planning Period	The planning period is inadequate, and should be extended to 2020.	Refer to responses to Comments 85.3 and 85.40.

Code	Topic 1	Topic 2	Comment	Response
85.169	Alternatives	Delay	There is no plan or program to deal with long-term growth at Logan, which will soon overwhelm any interim benefits of this project. There are measures that could be instituted to effectively address transportation in eastern New England, but there is no discussion in this document.	Refer to response to Comment 85.14.
85.170	Environmental Review Process	MEPA	...the Secretary of Environmental Affairs should determine that these significant planning deficiencies exist in the DEIS/DEIR that must be addressed. The DEIS/DEIR should be found inadequate, and a new Draft document should be required.	Refer to response to Comment 85.12.
85.171	Purpose and Need	Delays	Delay does not appear to be a major problem at Logan, based on FAA reports and Massport's 5-year history of inaction.	The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States. Logan Airport's estimated annual delay hours are over five times the FAA's threshold of 20,000 hours for a severely delayed airport. Refer also to response to Comment 85.4.
85.172	Analysis Assumptions/ Methodologies	Passenger Forecasts	This project and landside projects at Logan are interdependent, and both will increase capacity and stimulate demand.	Refer to responses to Comments 85.1, 85.16, 85.17 and 85.80.
85.173	Cumulative Impacts	Master Plan	The Airside Improvements Project is already "divisive and disruptive of established communities," and prospects for the long term are significantly worse.	Refer to response to Comment 85.115.
85.174	Noise	Sound Insulation	With respect to Section 7.3.1, Noise, it is necessary to iterate that the "sound-proofing" does not fully mitigate for the impacts of increased overflights and increased ambient noise.	Refer to response to Comment 85.28.
85.175	Air Quality	Model	With respect to odor impacts that may be associated with the proposed project, we believe the modeling approach used by Massport to be flawed and to require substantial enhancement.	The modeling of hydrocarbon emissions (used as an indicator of odor) was performed using MDEP-approved methods and is accurate.
85.176	Delay	Model	Questions why the Airport Machine Model and not the FAA-approved SIMMOD Model was used for capacity and delay analysis.	FAA recognizes and approves the Airport Machine model. In fact, the FAA helped fund Massport's acquisition of the Airport Machine for taxiway studies at Logan Airport. SIMMOD is an older, more general-purpose model that is most useful for airspace studies rather than capacity and delay analysis of runways and taxiways. The Airport Machine Model used in the analysis was developed to reflect operating conditions at Logan Airport.
85.177	Delay	Model	The CODAS information should be incorporated into the models developed (FLAPS and DELAYSIM) for the evaluation of the airside improvements at Logan. CODAS...should be considered in lieu of The Airport Machine.	Because the FAA and U.S. DOT delay statistics, including CODAS, only record historical delays, the FAA requires delay modeling when evaluating the future delay reduction benefits of airport capital improvements. This analysis indicates that: (1) flight delays at Logan Airport remain a significant problem and will become worse over time if no action is taken and (2) the Preferred Alternative can provide significant reductions in current and future delay levels.
85.178	Delay	Model	It is unclear why Massport chose to develop its own model for estimating delay when FAA has developed a model to do the very same.	DELAISIM is a unique model that simulates how Air Traffic Control uses an airport's runways over time based on actual weather patterns and expected demand conditions. The FAA does not have an equivalent model, but uses a simplified (and less precise) procedure of weighting delays based on percentage of time different weather conditions exist. Refer also to response to Comment 85.46.
85.179	Delay	Model	The models have not been verified or compared with historical information nor has it been shown that the development has been coordinated with FAA or the airlines.	Refer to first paragraph of Comment 85.46. The airlines were represented on the Airside Review Committee, an integral and active part of the Airside Project public process.
85.180	Delay	Model	Questions dates of hourly weather observation used and changes due to El Nino and La Nina.	Refer to response to Comment 85.5.

Code	Topic 1	Topic 2	Comment	Response
85.181	Delay	Model	One of the assumptions of the DELAYSIM model is that an air traffic controller first chooses 1) highest capacity configuration, 2) the configuration that most closely meets the PRAS goals. We believe this assumption is not supported by historical data ...	The DELAYSIM model uses the same logic for choosing a runway configuration as PRAS. First, the runways must be available given the current wind and weather. Second, the runways should be able to accommodate the projected demand for the hour in question (this may not be possible given the weather conditions). Finally, if multiple configurations meet these criteria, the selection attempts to maximize both short-and long-term PRAS goals without excessive controller workload. Annual goal conformance has improved since the Revised PRAS was installed in 1993, and Runway 14/32 would provide controllers with considerably more flexibility to achieve the PRAS annual goals in the future as well as enabling them to increase short-term relief. Refer also to response to Comment 85.20.
85.182	Delay	Model	No data is presented to show recent improvement due to the availability of Enhanced PRAS (EPRAS).	Refer to response to Comment 85.11.
85.183	Delay	Model	The DELAYSIM model should withdraw the PRAS goal decision-point as a runway configuration selection criteria and provide the model results using, as the leading criteria, the highest capacity configuration and air traffic controller workload weightings approved by FAA ATC.	Refer to response to Comment 85.47.
85.184	Delay	Model	For the model to assume the attainment of PRAS goals will improve significantly is unrealistic ...	Runway selection is constrained by weather conditions and demand characteristics, and it is unlikely that all eleven-runway end use goals can be attained in a given year. Annual goal conformance has improved since the revised PRAS was installed in 1993, and Runway 14/32 would provide controllers with considerably more flexibility to meet the PRAS annual goals in the future and enable them to increase short-term relief.
85.185	Delay	Model	The methodology of the DELAYSIM model as applied by Massport provides output that reflects a "best-case" though unrealistic scenario, and warps the follow-on analysis of the environmental issues.	The DELAYSIM model is based on what is believed to be a realistic attainment of PRAS with Runway 14/32. DELAYSIM represents the most refined model available for estimating long-term airfield operational use and delays. It is based on actual weather patterns, realistic demand variations, and validated airfield capacity under all foreseeable operating conditions. DELAYSIM models the FAA runway selection hierarchy of weather/wind, demand and then noise, and also includes controller workload constraints. The model was used to evaluate a set of operating scenarios representing the foreseeable range of Logan Airport's air traffic. The results of the operations and delays modeling provided inputs for sound environmental assessments.
85.186	Delay	Model	The assumptions made by the DELAYSIM model do not account for stimulative effect that would occur if these improvements are implemented.	Refer to responses to Comments 85.1, 85.16 and 85.17.
85.187	Delay	Model	Measurement of capacity and delay benefits requires that the relationship depicted in Figure 3-2 be determined for both the existing system and the proposed new one.	Figure 3-2 in the Airside Project Draft EIS/EIR is merely a conceptual diagram, but since the airfield improvements do not increase normal operating capacity of 120 operations per hour, the same relationship holds for the both existing and proposed situations.

Code	Topic 1	Topic 2	Comment	Response
85.188	Alternatives	Runway 14/32	Since FAA includes recognition of the stimulation effect in determining delay reduction, the model Massport uses should do the same.	<p>The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce the delays that now occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable, and cannot be readily anticipated by passenger or airlines, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts examined in the airside operational and environmental analyses would capture any potential variation in future passenger and aircraft activity at Logan Airport.</p>
85.189	Delay	Model	The FAA Technical Center at Atlantic City, New Jersey, should assist in simulating operations of the proposed new runway to verify the validity of the sole-source models used by Massport.	Refer to 85.46.
85.190	Delay	Model	[Concerned that] Massport's Airside Improvement Project proposal will not preclude increases in the delay experienced by airlines and their passengers. ... [and] building and operating a unidirectional Runway 14/32 is but a band-aid.	Refer to response to Comment 85.13.
85.191	Analysis Assumptions/ Methodologies	Forecasts	...[the] statement that if no actions are taken, Logan's annual runway and taxiway delays will rise... and exceed... today's modeled level.. High Fleet scenario ignores the multitude of other factors that would affect industry and passenger decisions.	The 45 million-passenger level was the highest traffic volume examined in the analysis and represents upper bounds for environmental impact analysis. As a result, undue weight was not given to the 45M High Fleet scenario in evaluating the comparative benefits of airside alternatives.
85.192	Delay	Model	The DEIS/DEIR indicates that "in 1998, it is estimated that Logan experienced approximately 121,000 hours of runway delay," ... the 121,000 hours of delay was generated by Massport's model and not by FAA. Presentation of this data, without reference, is misleading.	Refer to response to Comment 85.46. The methodology used for the Airside Project provides a consistent and systematic estimate of flight delays caused by constraints at Logan Airport. The analysis based on this methodology indicates that: (1) flight delays at Logan Airport remain a significant problem and will become worse over time if no action is taken and (2) the Preferred Alternative can provide significant reductions in current and future delay levels.
85.193	Analysis Assumptions/ Methodologies	Base Year	FAA calculated and reported delay at Logan has decreased almost 19% between 1993 and 1998. This information is not in DEIS/DEIR.	Refer to response to Comment 85.4.
85.194	Delay	Model	The DEIS/DEIR indicates that Logan's delay is six times the FAA's threshold; however, this analysis is flawed since the 121,000 hours of delay are measured by a different method than FAA's measurement.	Although the methodologies for measuring delays may differ, both are designed to indicate the severity of the delay problem at Logan Airport. FAA statistics consistently rank Logan Airport as one of the nation's most delayed airports.

[illegible]

Code	Topic 1	Topic 2	Comment	Response
85.207	Delay	Model	... the implementation of Alternative 1 or 1A ... is providing additional capacity ... providing additional "through-put" of aircraft operations.	The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.
85.208	Delay	Model	If as the DEIS/DEIR states, there are delay savings realized by this delay reduction, then there is also a stimulation of air travel demand ... This stimulation is not reflected in the annual hours of delay calculations.	Refer to response to Comment 85.186 & 85.188.
85.209	Analysis Assumptions/ Methodologies	Base Year	Figure 4.5-3, Distribution of Jet Aircraft Operations by Operating Direction, illustrates 1997 actual data. 1997 is not the base year.	The <i>Logan Airport 1998 Annual Update</i> included this information which had been developed in late 1998. The <i>Supplemental DEIS/FEIR</i> provides updated information for the year 1998.
85.210	Noise	Model	... assumes that FAA controllers would select the a) highest capacity configuration, b) meeting of PRAS goals. This assumption has not been historically proved to be true.	Refer to response to Comment 85.181.
85.211	Delay	Model	The section "Revised Wake - Vortex Turbulence Rules" implies that the "new" wake turbulence rules require one aircraft to follow the other at the stated distances. These rules are applicable only to Air Traffic Controllers for providing required spacings between aircraft for following and crossing traffic.	Section 1.5.3.2 of the Airside Project Draft EIS/EIR discusses FAA revisions to IFR radar separations and aircraft weight classifications. These represent the closest separations that can be applied by the controllers under IFR conditions. When visual flight is possible, pilots may visually separate themselves from preceding traffic. Visual separations are typically about 85 percent of IFR separations.
85.212	Delay	Model	Page 4-41 describes 1998 annual delay as 143,000 hours, whereas Page 1-12 describes 1998 annual delay as 128,000 hours. These are modeled hours, a product of "DELAYSIM," not measured hour or "FAA" hours.	Page 1-12 of the Airside Project Draft EIS/EIR clearly states that the 121,000 hours are from DELAYSIM. These are runway-only delays. Page 4-41 of the Airside Project Draft EIS/EIR refers to total modeled delays including runway and taxiway.
85.213	Analysis Assumptions/ Methodologies	Base Year	The use of 1998 data rather than 1993 data strengthens the argument that the "Base Year" must be revised.	Refer to response to Comment 85.3.
85.214	Delay	Model	Questions the validity of the total delay hours calculated by the DELAYSIM model.	The DELAYSIM model represents the most precise model developed to date for measuring delay at Logan Airport.
85.215	Regional Transportation	Regional Airports	No discussion was included concerning development of a new airport to accommodate demand and reduce delays at Logan.	Refer to response to Comment 85.9.
85.216	Alternatives	Other Non-Construction Alternatives	No discussion was included concerning Consideration of Implementing a High-Density Rule (Slots) to control congestion at Logan.	Refer to response to Comment 85.54.
85.217	Noise	Nighttime noise	No discussion was included concerning ... Implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions ... A specific measure that could be considered is a cap on nighttime operations.	Refer to response to Comment 85.26.

Code	Topic 1	Topic 2	Comment	Response
85.218	Regional Transportation	Regional Airports	No discussion was included concerning Diversion of general aviation traffic and origin/destination traffic of both regional non-jet and short-haul jet traffic to Massport's Hanscom Field.	Section 2.6 of the Supplemental DEIS/FEIR includes a discussion of Hanscom Field's role in the regional transportation system. General aviation traffic forms a very small percentage of Logan Airport operations (less than five percent) and is not a significant factor in the accumulation of delay. Hanscom Field is a designated reliever airport for Logan Airport and Massport maintains it to encourage use by general aviation. Consistent with Hanscom Field's 1974 Master Plan and the Hanscom GEIR, Massport recently approved the commencement of regional non-jet service at Hanscom Field. Also refer to Comment 85.8.
85.219	Regional Transportation	Regional Airports	[Believe Hanscom has potential to absorb O&D]	Refer to response to Comment 85.8.
85.220	Regional Transportation	Regional Airports	Does not the very conclusion of the Second Major Airport study point out that long-term considerations to meet increasing demand require that a second airport ... be an alternative to the improvements recommended?	Refer to response to Comment 85.9.
85.221	Regional Transportation	Regional Airports	... the development of another air carrier airport has not been reasonably discussed nor have the reasons for its elimination as an option.	Refer to response to Comment 85.9.
85.222	Regional Transportation	Regional Airports	The fact that Massport does not provide long-term planning forecasts ... teamed with its inability to provide as an option the development of a second airport highlights the short-sightedness of the long-term development. ... In the case of many of the close-in neighborhoods, the option for a second airport is reasonable to minimize adverse impacts on their quality of life.	Refer to responses to Comments 85.9 and 85.40.
85.223	Regional Transportation	Diversions	Questions why diversion of passengers to regional airport use, rail use and video and online conference use are indicated to be the same at a 45M forecast level and a 37.5M forecast level.	The estimated passenger diversion of up to 7.3 million includes 3.4 million to regional airports, 2.4 million to telecommunications, 1.2 million to Boston-New York high speed rail service, and 0.3 million to other regional rail projects. The regional airport diversion estimates are averages of the diversion estimates for the 37.5M and 45M passenger demand scenarios. The averages were presented in the Airside Project Draft EIS/EIR document for simplicity of presentation. The rail estimates are from existing, independent rail planning documents that examined total inter-city travel demand regardless of mode of travel and then predicted mode shifts that would result from implementing the rail project. Hence the rail estimates do not differ for the 37.5M and 45M Logan Airport passenger scenarios.
85.224	Regional Transportation	Regional Airports	... the estimated service area of the alternate airports remains the same in 2010 as it is in 1994. This is not an accurate assumption ... Massport fails to list Hanscom Airport as a potential diversion airport.	The regional airport diversion analysis presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR was based on objective service area assumptions. Each service area was defined solely by driving time criteria. In other words, each regional airport's service area consists of cities and towns for which it is the closest airport, regardless of the availability of more services and/or lower airfares at more distant, but larger airports such as Logan Airport. In reality, passengers do drive to larger, but less convenient airports because they offer greater service choices or better airfares than the local regional airport. Thus, the area from which a regional airport draws traffic is often limited by the existence of nearby, larger airports. These limitations were not considered in the regional airport, service area, assumptions that underlie the regional airport diversion analysis.
85.225	Regional Transportation	Regional Airports	Massport fails to list Hanscom Airport as a potential diversion airport.	Refer to response to Comment 85.8.

Code	Topic 1	Topic 2	Comment	Response
85.226	Regional Transportation	Regional Airports	This is a regional problem demanding of regional solutions. ... The Airside Improvement Project must be viewed in this larger regional context.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
85.227	Alternatives	Peak Period Pricing	Questions assumption to have peak hour pricing be revenue neutral and pertain only to Airfield revenue and costs at Logan.	Refer to response to Comment 85.62. Guidance with respect to a PPP program and its cost-based structure is set in U.S. DOT's decision in the PACE procedure.
85.228	Alternatives	Peak Period Pricing	Massport's previous experience with regulatory challenges in implementing a demand management technique has affected the assumptions of the model developed.	It would not be prudent to ignore prior experience in developing an illustrative pricing structure for consideration. Refer also to response to Comment 85.62.
85.229	Alternatives	Peak Period Pricing	Suggest a different approach to efficiency, away from the number of aircraft operations in specific periods to maximizing throughput of passengers.	Refer to response to Comment 85.63.
85.230	Alternatives	Peak Period Pricing	Massport's model for peak hour pricing has chosen too narrow a definition of the regulatory criteria it must meet to establish a peak hour pricing structure.	Massport disagrees. Refer to responses to Comments 85.62 and 85.228.
85.231	Alternatives	Peak Period Pricing	[Massport's model for peak hour pricing] also has chosen a higher operational threshold (115 operations) which underestimates the delay reduction capabilities of peak hour pricing.	This statement is incorrect. The PPP analysis was conservatively based on an assumed threshold of 110 operations per hour. Given Logan Airport's normal operating capacity of 120 operations per hour, a higher threshold, like 115 operations per hour, may be appropriate, if PPP is implemented.
85.232	Analysis Assumptions/ Methodologies	Fleet Mix	Massport chose varying data information, both 1993 and 1995 flight schedules for modeling peak hour pricing simulations. Massport has again chosen the input of information which will provide the output it expects.	1993 and 1995 were chosen as representative of historic high and low fleet operating conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR. 1993, the peak year for regional carrier activity at Logan Airport when three large regional airlines were competing actively, is representative of a 37.5 High Fleet scenario. Conversely, 1995, which reflects the failure of Precision Airlines and only two major regional carriers serving the Boston market, is representative of Low Fleet operating conditions.
85.233	Alternatives	Peak Period Pricing	The option of utilizing "costing" (including peak period pricing) approaches for the purpose of delay reduction should be retained.	Refer to response to Comment 85.66.
85.234	Regional Transportation	Diversion	A shift away from air travel through reliance on other means of travel or communication is essential. Vigorous measures to foster and encourage this shift should be undertaken by State government in cooperation with Amtrak and telecommunications providers.	Refer to response to Comment 85.67.
85.235	Alternatives	Preferred Alternative	No indication of how the project is to be financed is provided ...	Refer to response to Comment 85.70.
85.236	Environmental Review Process	FAA/NEPA	Table 8.8-1 does not include the benefit-cost analysis as part of the anticipated permits and approvals required by the FAA.	Refer to response to Comment 85.68.

Code	Topic 1	Topic 2	Comment	Response
85.237	Environmental Review Process	FAA/NEPA	... there is no economic analysis of the noise impacts regarding the various alternatives.	Refer to response to Comment 85.69.
85.238	Alternatives	Runway 14/32	The discussion of this (Option C) as a feasible option did not include a discussion of aborted takeoffs in the 14 direction, and whether the reduced safety overrun would be approvable under that scenario.	Runway 14 is not expected to be used for departures, and these departures would be over water and mostly by smaller aircraft which do not require as large a Runway Safety Area (RSA). For ARC B-III aircraft, the RSA is only 600 feet by 300 feet compared to the 1,000 foot by 500 foot RSA shown in Figure 3.2-4 of the Supplemental DEIS/FEIR. Option C includes a layout design in accordance with FAA standards that provide for safe takeoffs.
85.239	Alternatives	Runway 14/32	Differentiate between cross wind of 20 knots and cross wind component of 20 knots.	A direct crosswind of 20 knots would equate to a wind direction that is perpendicular (90 degrees) to the runway direction. A crosswind component is the calculated equivalent impact of winds that are at an angle of less than 90 degrees to the runway. The wind rule referenced on Page 3 through 7 of the Airside Project Draft EIS/EIR refers to crosswind and tailwind components of the wind vector.
85.240	Alternatives	Taxiway Improvements	The summary of advantages cited for the Centerfield Taxiway (page 3-29) supports the community concern that the presence of the Centerfield Taxiway will make the use of the 4/22 runway combinations more attractive and ... it would increase the tendency to stack aircraft in the northern section of the airfield.	Refer to response to Comment 85.74.
85.241	Alternatives	Runway 14/32	The preferred alternative recommendation does not state which runway option is being recommended. If ... Option C is the preferred layout. ... then it is critical to note that this option would require a modification to standard from the FAA regarding the runway safety area.	Refer to Section 8.2 of the Supplemental DEIS/FEIR, which clearly states that Option C is the preferred layout for Runway 14/32 and that Option C requires a determination of an acceptable level of safety.
85.242	Alternatives	Runway 14/32	The discussion of Option C does not evaluate the potential of declared distances or displaced thresholds in lieu of requesting a modification to standard.	Declared distances may be used when standard runway safety areas cannot be provided. Massport's Option C provides a full 1,000-foot safety area at both ends of the runway on centerline with only a small percentage of the runway safety area on Runway 32 over water. This option, plus the planned addition of visual aids for pilots (e.g., PAPI/REIL), will provide a reasonable and practicable level of safety.
85.243	Analysis Assumptions/ Methodologies	Fleet Mix	The aircraft mix projected to use Runway 14/32 that was used in the noise analyses should be stated, and justified.	Unidirectional Runway 14/32 would be principally used by regional non-jets and small jet aircraft capable of landing or taking off in 5,000 feet. Appendix E of the Supplemental DEIS/FEIR contains the fleet mix and runway use percentages for each scenario. Sections 6.2.1 and 6.2.5 of the Supplemental DEIS/FEIR present summaries of the INM inputs used for the in-flight noise analysis.
85.244	Analysis Assumptions/ Methodologies	Fleet Mix	<p>The justification on Page 3-24, that only regional and commuter aircraft will use the runway is not consistent with the Airport Design Category (ARC) selected for the Runway which is C-III. C-III aircraft include the following:</p> <ul style="list-style-type: none"> * Airbus A-320-1000 * BAC 111-200, -300, -400 & -475 * Boeing 727-100, & -200 * Boeing 737-100, -200, -300, -400 & -500 * Fokker F-28-3000 & -4000 * MDC DC-9-10, -15, -20, -30, -40 & -50 * MDC DC-9-80 & -82 	<p>Design Category C-III indicates the highest approach speed and widest wingspan of the aircraft intended to use the runway. Approach Category C includes a number of business jets as well as the Saab 2000 and Avro RJ100 commuter jets. Design Group III includes a host of commuter aircraft such as ATR, Avro RJ, ATP, Dash7, Dash8, Fokker 50/60, and Saab 200.</p> <p>Although larger jets fall into the C-III as noted in the comment, their required runway takeoff and landing distances would prevent most of these aircraft from using Runway 14/32. For operating efficiency, FAA controllers would keep the large jets on Runway 33L and the smaller aircraft on Runway 32.</p>

Code	Topic 1	Topic 2	Comment	Response
85.245	Alternatives	Runway 14/32	It appears that Massport is presenting the proposed runway as a non-precision runway used only by commuter aircraft. However, it is obvious that long-range plans include precision instrument capabilities and operations by a variety of large jet aircraft.	A precision runway is one that provides electronic landing guidance in the vertical dimension, which can benefit all types of aircraft operations, not just commercial jets. Runway 32 has always been intended for precision approach guidance, probably using the new GPS navigation capability. Landing instrumentation is no indication of the aircraft that will use a runway. Most large jet aircraft would be unable to use Runway 14/32 because of its length. Refer also to Comment 85.244.
85.246	Alternatives	Runway 14/32	... Massport cannot, as proprietor of the airport, ensure that proposed Runway 14/32 will be unidirectional.	Refer to response to Comment 85.19.
85.247	Alternatives	Runway 14/32	Although Massport states that Runway 14/32 will be built with a non-precision approach, their discussion shows that there may be the possibility of making this a precision approach...with construction of a light pier (for Runway 32] similar to that on Runway 33L. ... the runway combinations of arrivals on Runways 33L and 32, with departures on Runway 27, would become the highest capacity combination under IFR conditions.	The primary benefit of Runway 14/32 is to reduce delays during VFR conditions when strong northwesterly winds current limit Logan Airport to a single arrival stream. During IFR conditions, landings on Runway 32 would be limited by obstacle clearance—ship masts in the harbor and buildings in Boston. No approach lighting pier is planned for Runway 32 since it could not improve the landing minimums below 400 to 500 feet. Moreover, under IFR conditions the capacity of the Runway 33L/32/27 configuration would be compromised by the need for diverging missed approach and departure paths and the crossing of both Runway 32 and Runway 33L by Runway 27 departures.
85.248	Delay	Model	The delay hours projected by Massport are the artifacts of its own model, and do not comport with the FAA's procedure for calculating delays at airports. In addition to calculating every minute of delay associated with every single flight, it fails to take into account normal flight cancellation activities by airlines. Additionally, FAA calculation and tabulation of delays at Logan over the last five years shows little change either year to year or as a trend.	Refer to response to Comments 85.46, 85.195, and 85.196.
85.249	Alternatives	Peak Period Pricing	...peak period pricing must be instituted immediately.	Refer to response to Comment 85.66.
85.250	Alternatives	Runway 14/32	"Modification of standards" for Layout Option C should be thoroughly explored.	A Determination of Acceptable Level of Safety, not a Modification of Standards, is required from FAA for Option C.
85.251	Air Quality	Impacts	... believe there are adverse air quality impacts associated with construction of Runway 14/32 and the Centerfield Taxiway.	The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.
85.252	Noise	Sound Insulation	Residential "sound-proofing" does not fully mitigate the impacts... from implementation of Alternative 1 or Alternative 1A...	While sound insulation does not mitigate exterior sound levels, it is a widely accepted measure considered appropriate for general mitigation of noise impacts. Sound insulation reduces noise inside the home. While the implementation of the Preferred Alternative would bring additional homes within the criteria for inclusion in the sound insulation program, the inside of these homes will have lower noise levels than they would have had without sound insulation under the No Action Alternative. Measures designed to improve PRAS (i.e., the PRAS monitoring program) are also mitigation measures. Improved achievement of PRAS goals under the Preferred Alternative will further benefit the most highly exposed areas around Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
85.253	Noise	Impacts	The reduction in ground noise impacts claimed for Alternative 1 or Alternative 1A...is likely to be short-lived...	The ground noise analyses in Section 6.2.4 of the Airside Project Draft EIS/EIR lead to the opposite conclusion. For example, Table 6.2-21 of the Airside Project Draft EIS/EIR indicates that, at all seven sites examined, the reduction in exposure is greater under both the longer-term 37.5M High Fleet and 29M Low Fleet scenarios than it is under the near-term 29M Low Fleet scenario. Recent growth trends suggest the 37.5 million passenger level is now more likely to occur around 2015. (Refer to related discussion in Section 1.4.2 of the Supplemental DEIS/FEIR).
85.254	Ecosystems	Rare Species	... creation of a replacement habitat on Cape Cod [for the upland sandpiper] appears to ignore geography and is of questionable benefit.	Refer to response to Comment 85.78.
85.255	Alternatives	Peak Period Pricing	...disagree with the recommendation to defer implementation of peak period pricing.	Refer to response to Comment 85.66.
85.256	Alternatives	Runway 14/32	The commitment to maintain Runway 14/32 as a unidirectional runway is clearly reversible.	Refer to response to Comment 85.19.
85.257	General Opposition		... this project sends [the signal] that Massport continues to be committed to expansion of Logan Airport, ... concerns ... the surrounding communities.	Refer to response to Comment 85.80.
85.258	Analysis Assumptions/ Methodologies	Planning Period	The selection of the preferred alternative responds solely to the current conditions and points out Massport's continued blindness to the long-term demand and capacity issues.	Refer to response to Comment 85.82.
85.259	Alternatives	Preferred Alternative	Alternate No. 2 and Alternate No. 3 appear to be the most viable for the community.	Refer to response to Comment 85.81.
85.260	Environmental Review Process	FAA/NEPA	The DEIS/DEIR discusses the preferred alternatives effect on historic districts but does not comment on the urban quality, or the design of the built environment.	The proposed projects evaluated under each of the alternatives are located on the existing airfield. Implementation of any of the proposed projects will not physically change the urban characteristics or the design of the built environment within adjacent communities when compared to the No-Action Alternative. Off-airport noise impacts from the Preferred Alternative are discussed in Section 6.2 of the Supplemental DEIS/FEIR.
85.261	Environmental Justice	Impacts	The external costs ... that the preferred alternative would impose on the Logan communities are substantial. These costs have not been adequately assessed ...	Refer to response to Comment 85.68.
85.262	Open Space/ Parkland	Impacts	Noise impacts on historic sites ... was not adequately evaluated ...	The FAA and Massport have consulted with the Massachusetts Historical Commission (MHC). The MHC has concurred with the FAA's determination that the Preferred Alternative will have no adverse effect on significant historic properties. Refer to Section 6.3.2 of the Supplemental DEIS/FEIR for a description of historic properties, project impacts and mitigation.

Bcc: Arthur Pugsley@MEPA@EOEA
From: "Anastasia Lyman" <alymaninc@earthlink.net>
Subject: Comment on EOE A #10458 - please confirm receipt of this comment
Date: Wednesday, April 21, 1999 4:38:33 EDT
Attach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

LETTER 86

18 Greenough Avenue
Jamaica Plain
Boston, MA 02130

April 20, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Unit
Arthur Pugsley, EOE A No. 10458
1000 Cambridge Street - 20th floor
Boston, MA 02202

Dear Secretary Durand,

I am writing to comment on the Massachusetts Port Authority's (MPA) Logan Airside Improvements Planning Project Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/R) EOE A #10458.

The DEIS/R does not make a credible case for building the proposed Runway 14/32 in order to solve operational delays at Logan International Airport. Its conclusions are based on out-dated data and a system for projecting delays which is neither approved nor accepted on a national level by the FAA. The chosen system produces large numbers of hourly delays contrary to FAA and DOT figures which show quite the opposite.

The DEIS/R does not adequately address either the socio-economic impacts or the significant environmental impacts from the proposed project to inner city metropolitan Boston communities. At the same time, it simply dismisses the environmental justice issue by proffering the mitigation of sound insulation. The report, however, fails to consider FAA Order 5100.38A in this regard. Order 5100.38A makes any structure not up to current local building code ineligible to receive AIP funds. Since the cost

86.1

86.2

born by the owner, and since most residences newly impacted by this project's noise are in low-income and minority neighborhoods, it is safe to assume that such costs would be a hardship and possibly unlikely to occur. Therefore, there would be no mitigation, and the lack thereof would be explicitly due to economic hardship.

The computer noise model (INM) used in the EIS projects a tripling of noise over most of South Boston, the South End, Roxbury, Jamaica Plain, East Boston, Charlestown and most of Chelsea. Incredibly, such an increase is not deemed to be a "significant" environmental noise impact. Furthermore, there is no discussion in the DEIS/R about how MPA could "avoid or minimize" these impacts or how MPA can "enhance the quality of the human environment" in these close-in, densely populated, low-income and minority communities. (CEQ sec.1502.1)

86.3

As you know, Regulation 301 CMR 11.01 states that MEPA must "assist each Agency in using all feasible means to avoid Damage to the Environment." Your agency cannot do so if "all feasible means" have not been analyzed. MPA has left out of its analysis any benefits derived from increasing the use of MPA's Hanscom Field or the construction of a second major airport.

86.4

As a member of the Community Advisory Committee to MPA(CAC), I did not receive a Notice of Project Change (301 CMR 11.10 [7]). It is not in the DEIS/R. My understanding is that those who received the ENF had commented on the ENF should have received the notice. I ask that the Notice of Project Change be denied. The Notice for Lapse of Time between the publication of the ENF and the publication of the notice of the availability of the EIS/R should have been filed in August of 1998. I believe that the lapse of time was a conscious choice of MPA affecting the environmental impact conclusions in the DEIS/R through the use of out-dated data from 1993, MPA's 'base case', as well as the use of ten year old (1981-90) weather data. These important factors, upon which MPA's conclusions are drawn, are inappropriate and unacceptable.

86.5

From April 1997 through January 1999, MPA discontinued EIS/R Airside Review Committee (ARC) meetings, giving no reason other than that the project was "on hold." After a self-imposed delay of twenty months, MPA then chose not to redo the analysis with more current relevant data, but to continue using data that was, by then, between seven and seventeen years old. For that reason also, I urge that the Notice be denied and the study returned to MPA to be redone with more current data and a more complete range of alternatives.

the DEIS/R should be a full disclosure document and it is not. Noise contour maps are illegible, making the identification of exactly which communities will be impacted by which contour (DEIS/R pages 6-24 through 6-30) impossible. The reliance on the GEIR as filler for the DEIS/R is unacceptable. The 1997 GEIR is a broad scale analysis of all proposed MPA projects. Neither document adequately addresses the cumulative impacts of ground transportation environmental pollutants along with the airside pollutants. Common sense dictates that an increase of over 20 million passengers using Logan Airport within the next ten years will most certainly have an effect on ground traffic throughout metropolitan Boston. I find it outrageous, then, that MPA can state, "The Airside Project will have no effect on vehicle traffic, transit systems or major roadway intersections." " It will have no affect on VOC or NOx emissions from motor vehicles"(DEIS/R Volume II, Letter 1, Code response 1.15 & 1.16). This EIS/R and the GEIR have no detailed ground traffic study for long-term environmental impacts. 86.6

This EIS/R is a capacity-enhancing project, with large numbers of people being significantly impacted by noise, traffic and air pollution while existing environmental impacts have yet to be adequately mitigated.

I respectfully ask that the DEIS/R be found inadequate by the Secretary of Environmental Affairs for the reasons stated above, as well as for those reasons submitted by the CAC and Attorney Peter Hoff. I ask that you join the CAC and Communities Against Runway Expansion (CARE) in requesting that MPA and the FAA withdraw the project from further public consideration or processing until development of a true Regional Transportation Planning Forum can evaluate regional needs and all alternatives to the Runway 14/32 proposal. 86.7

Sincerely,

Anastasia Lyman

Letter 86

Community Advisory Committee Co-Chair

Anastasia Lyman

Code	Topic 1	Topic 2	Comment	Response
86.1	Environmental Justice	Impacts	...does not adequately address either the socio-economic impacts or the significant environmental impacts...to inner city metropolitan Boston communities.	Noise was identified as the only off-airport impact from the Preferred Alternative with the potential for environmental justice impacts. The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. However, because the area added to the 65 dB DNL contour is primarily within the City of Chelsea, other environmental and health issues were also considered in an effort to assess other cumulative or multiple adverse exposures. Refer to Section 6.8.6 of the Supplemental DEIS/FEIR for additional information.
86.2	Noise	Sound Insulation	Concerned about sound proofing eligibility on low income homeowners with existing code violations.	Federal requirements typically exclude the FAA from any responsibility to bring a building up to code when the structure is sub-standard but otherwise qualifies to participate in an airport-sponsored sound insulation program. However, to address impacts in particular projects such as the proposed Airside Project, FAA has discretion to use grant funds to bring buildings up to code as part of this mitigation program to the extent such improvements are required to proceed with the sound insulation work. The mitigation program for the Airside Project includes use of grant funds for such purposes.
86.3	Noise	Impacts	The computer noise model (INM) used in the EIS projects a tripling of noise over most of South Boston, the South End, Roxbury, Jamaica Plain, East Boston, Charlestown and most of Chelsea. Incredibly, such an increase is not deemed to be a "significant" environmental noise impact.	While equivalent jet operations increase by more than 50 percent from a 1993 base to the future 37.5M High Fleet scenario if the Preferred Alternative is implemented, the appropriate basis for comparison of the Preferred Alternative is the No Action Alternative. Equivalent jet operations would increase by more than 75 percent over the Preferred Alternative if no action were taken. Despite the increase in equivalent jet operations, the Airside analysis indicates that overall noise impacts decline over time with the elimination of Stage 2 aircraft and the replacement of hushkitted Stage 3 aircraft with non-hushkitted Stage 3 aircraft. By allowing aircraft operations to shift from over-land to over-water routings and by providing greater flexibility in the use of Runways 27 and 33L for takeoff, the Preferred Alternative further reduces the highest noise impacts to the close-in neighboring communities.

Code	Topic 1	Topic 2	Comment	Response
86.4	Regional Transportation	Regional Airports	MPA has left out of its analysis any benefits derived from increasing the use of MPA's Hanscom Field or the construction of a second major airport.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.</p> <p>A second major airport is not a solution to the current delay and congestion problems at Logan Airport.</p>
86.5	Environmental Review Process	MEPA	I did not receive a Notice of Project Change [301 CMR 11.10(7)]. I ask that the Notice of Project Change be denied.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
86.6	Noise	Studies	Noise contour maps are illegible, making the identification of exactly which communities will be impacted by which contour (DEIS/R pages 6-24 through 6-30) impossible. . The reliance on the GEIR as filler for the DEIS/R is unacceptable.	Refer to the new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
86.7	Environmental Review Process	MEPA	I respectfully ask that the DEIS/R be found inadequate....	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.

Dear Mr. Puglsey,

I am writing you today to express my support for the findings of the CAC consultants with regard to the Logan Airside Improvement Project EOE #10458. I find the document to be lacking in many areas.

The delay problem will continue to grow regardless if there is a new runway because of the projected growth of passengers. Flight delays due to this projected growth will not be the only result from this growth but there will be catastrophic ground vehicular delays because the current road infrastructure will not be able to accommodate these passengers. This should be a clear signal that instead of expanding at Logan there needs to be a more sound and rational approach and my belief is that approach is a multi-faceted reliever airport system (a regional solution).

87.1

This system would in fact not only take care of the projected growth but must also downsize Logan itself. For far too long, Logan has been growing and it is the surrounding communities that are suffering the pains of that growth. Environmental justice dictates that the time has come to halt any further expansion and to roll back some of the growth that has gone on unchecked for many years.

87.2

Massport & the FAA have created flawed metrics with regard to: the number of delay hours; Peak Period Pricing scheme; PRAS Goal attainment; Soundproofing mitigation; and regional airport system.

Never it is mentioned that the base year of 1993, as regards delay, that it was a record year for snowfall, setting a record with 96" of snow. Not your typical weather-year.

87.3

Peak Period Pricing, as presented, is certainly only ~~one~~ one scheme that could be devised. Before spending \$25M it would be worth a look at other schemes that could help reduce delay during peak periods.

87.4

PRAS is an advisory system of suggestions to the FAA Air Traffic Controllers who have been loath to avail themselves of its suggestions, historically.

87.5

Sound Proofing for homes is dubious mitigation at best. The 65 db LDN requirement is too low a threshold. Sound proofing will not work if you must have your windows open, such as in the warm weather and of course it does nothing for your outdoor environment. People can not be expected to be kept bottled up in their soundproof home.

87.6

Regionalization of air transportation system makes good sense. If Logan drew its passenger base only from within the Rt 128 area that would certainly be a considerable number of people, however Logan in fact draws from a much greater area and therein lies a major fault. Logan is NOT centrally located to this great area but is in fact on one far edge of this area. The problems increase when all these people coming to Logan are squeezed together much like as in a funnel or venturi. The very movement, in whatever means, of these people toward Logan creates stresses on the environment. Pollution breeds health problems. If some ~~catastrophe~~ catastrophe should happen to the funneling infrastructure that brings people to Logan then those very people are going to experience more than a delay problem, they may even miss the flight. If on the other hand a major catastrophe should happen at Logan then the whole region suffers. It is eminently more sound to have multiple airport facilities. The logistics makes better sense. The better quality of life and environment make better sense. It is the American way to have more competitive alternatives to choose from.

In closing I would relate that a
do experience jet departure noise at
greater when a particular runway is in
not now or projected to be within
Contour. Remember the ads for home
are assuring purchasers that their 8500
drive the burglar away. Well sir
from jet departure overflights is drive
away from my phone conversation;
enjoying some TV; just away from
life.

Arthur Horne
CAC Tech consult

Letter 87

Community Advisory Committee

Technical Consultant

Arthur Hartnet

Code	Topic 1	Topic 2	Comment	Response
87.1	Regional Transportation	Regional Airports	The delay problem will continue to grow regardless if there is a new runway...there needs to be a more sound and rational approach and my belief is that approach is a multi-faceted reliever airport system (a regional solution).	<p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.</p> <p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p>
87.2	Environmental Justice	Impacts	Environmental justice dictates that the time has come to halt any further expansion....	Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.
87.3	Analysis Assumptions/ Methodologies	Base Year	Never is it mentioned that the base year of 1993, as regards delay, that it was a record year for snowfall....	Delays are a function of wind and weather conditions throughout the year, as well as the corresponding traffic demand. For example, overnight snowstorms cause relatively few delays because the demand is low. 1993 was also a record year for airline overscheduling.

Code	Topic 1	Topic 2	Comment	Response
87.4	Alternatives	Other Non-Construction Alternatives	Before spending \$25M it would be worth a look at other schemes that could help reduce delay during peak periods.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i> , published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i> . The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i> , published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
87.5	Noise	PRAS	PRAS is an advisory system of suggestions to the FAA Air Traffic Controllers who have been loathe to avail themselves of its suggestion, historically.	During very high demand periods, the controllers have little or no flexibility for runway selection and PRAS recommends an appropriate runway configuration given the extant demand. Unidirectional Runway 14/32 would give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals. The Supplemental DEIS/FEIR demonstrates that the controllers have been improving performance with respect to PRAS recommendations. Section 8.5 of the Supplemental DEIS/FEIR contains methods for more comprehensive monitoring of PRAS. These methods will be implemented as part of the mitigation program for the Airside Project.
87.6	Noise	Sound Insulation	Sound proofing for homes is dubious mitigation at best. The 65db LDN requirement is too low a threshold...People cannot be expected to be kept bottled up in their soundproof home.	Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i> . Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including: Noise abatement and runway use restrictions; Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation; Encouraging growth at Worcester Regional Airport and other alternative airports; and Monitoring and improving achievement of PRAS goals.

1. *Journal of the American Medical Association*, 1997; 277: 1039-1043.

ROXBURY AIRPLANE POLLUTION COMMITTEE

April 17, 1999

Mr. Robert Durand
Secretary, Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley EOE No. #10458
100 Cambridge Street 20th Floor
Boston, MA 02202

Sir,

The official rationale behind the Logan expansion project being submitted by Massport is unambiguous: operational delays. Yet, in a recent radio advertisement, a major airline boasted that its shuttle operations from Logan airport had an on-time performance rate of 97%. Another airline has been adding flights to its West Coast destinations from Logan. Their chief competitor is scheduling new nonstop service to Europe while some European carriers have started flights to Boston.

These facts fly in the face of the official rationale for this expansion project. Inevitably, fairness would require Massport to provide an in-depth analysis of the causes and the extent of the delays justifying the erection of a new runway at Logan airport. It seems equally fair to ask whether the invoked delays truly hinder carriers in their current operations or deter them from expanding their already considerable operations at Logan airport.

88.1

The Draft Environmental Impact Statement/Environmental Impact Report is totally silent on the already prohibitive cost borne by populations under the flight paths out of Logan airport. The significant increase in air-traffic resulting from the erection of runway 14/32 will make a very bad situation considerably worse. At times already, 2 jetplanes/minute fly over some communities and for up to 17 consecutive hours. Just as has been done with the relocation of the Sandpiper, the terrible toll exacted by Logan operations on surrounding communities, including the less privileged ones, must be quantified. Roxbury in particular has been unduly hit by unprecedented pollution from airplane activity without any compensation or mitigation. This unbearable burden is slated to reach unreasonable heights with the new runway. Any expansion at Logan airport will then further degrade the quality of life for residents with no appreciable gain for airline passengers.

88.2

The alternative of routing these passengers through relief airports or other transportation means demands more than the cursory treatment in the Draft EIS/EIR.

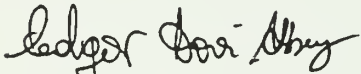
Indeed, there may lie some of the best options to accommodate additional travelers to the Boston area, Massachusetts and New England.

We respectfully urge you to reject the current proposal from Massport and require the agency to undertake a comprehensive assessment of all available options to adequately accommodate the needs of passengers in the immediate as well as the more distant future.

88.3

Like San Francisco, Denver, Hong Kong, Paris, Munich, Montreal, New York, Washington D.C. and other world-class cities, Boston and its visitors deserve a multiple-airport system residents can live with. An inadequate proposal of the 1970's is an unlikely answer to the challenges of air-traffic growth in the 21st century.

Respectfully yours,



Dovi Abbey
Roxbury Representative to the CAC
4 Humboldt Avenue
Roxbury, MA 02119

Letter 88

Community Advisory Committee Representative, Roxbury Roxbury Airplane Pollution Committee Dovi Abbey

Code	Topic 1	Topic 2	Comment	Response
88.1	Purpose and Need	Delay	...fairness would require Massport to provide an in-depth analysis of the causes and the extent of the delays justifying the erection of a new runway at Logan Airport.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport delays within the context of delays at other United States airports.</p>
88.2	Environmental Justice	Impacts	The terrible toll exacted by Logan operations on surrounding communities, including the less privileged ones, must be quantified. Any expansion at Logan Airport will then further degrade the quality of life for residents with no appreciable gain for airline passengers.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPR</i> and its updates.</p> <p>Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively.</p>

Code	Topic 1	Topic 2	Comment	Response
88.3	Regional Transportation	Regional Airports	[Need] to undertake a comprehensive assessment of all available options to adequately accommodate the needs of passengers in the immediate as well as the more distant future.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i> , published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i> . The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i> , published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.

April 21, 1999

Arthur Pugsley
Massachusetts Executive Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, MA 02202

RE: Runway 14/32, #10458

Dear Mr. Pugsley:

As a member of the Community Advisory Committee representing Roslindale and Hyde Park, I have enclosed my comments in response to the Environmental Impact Study/Report submitted by Massport relative to Runway 14/32 at Logan International Airport.

It is my hope that your agency will carefully review and incorporate resident concerns regarding the negative public health impact of this proposal on the surrounding communities. There is widespread citizen opposition to this proposal and your analysis relative to the negative environmental impact is vital to set the framework that will allow residents who live in the surrounding communities a more broad based effort in reviewing this ill-conceived proposal.

Thank you for your immediate attention to this issue and please make my comments a part of the official comments regarding Runway 14/32.

Very truly yours,

A handwritten signature in cursive script, reading "Alex Geourtas".

Alex Geourtas
Roslindale/Hyde Park Representative
Community Advisory Committee

TO: Arthur Pugsley, MEPA Unit
Mass. Executive Office of Environmental Affairs

FROM: Alex Geourntas, Roslindale/Hyde Park Representative
Community Advisory Committee to Massport

RE: *Massport's Runway 14/32 Proposal-EIS/EIR Report*

DATE: April 12, 1999

As the Roslindale/Hyde Park representative on the Community Advisory Committee (CAC), I am writing to state my opposition to Runway 14/32 and the Environmental Impact Report/Study as submitted by Massport.

This issue has united many residents of the various communities surrounding Logan Airport. Many residents are strongly opposed to this expansion. I have attended many CAC and community meetings where Massport's presentation suggests that the new runway will have a positive impact on Logan Airport, passengers and for business interests in New England. There is no mention of its negative impact to the surrounding neighborhoods and communities that will see a definitive increase in airplane traffic and noise further compromising the quality of life of these residents.

I am surprised by Massport's refusal to recognize the environmental impact and direct consequences of the new runway upon homeowners in Boston and the North and South Shores of our state. The cumulative effect of airplane noise and exhaust is an environmental concern and the long term effects of this exposure is a public health hazard; not to mention the increased traffic and congestion that will occur in downtown Boston, in particular in East Boston and South Boston. Congestion is a problem now throughout Boston and Runway 14/32 will make a bad situation worse. Massport is no friend to area residents. It continuously ignores the impact the airport is having on the surrounding communities and Massport precludes any mention of the community impact in any of their presentations.

89.1

The building of the new runway will increase capacity at the airport that in turn will increase takeoffs and landings that in turn will increase passenger and cargo capacity, which in turn will increase the "bottom line" for Massport-the only real concern for Massport. The "delay" argument is not persuasive since Massport Executive Director, Peter Blute admitted to manipulating the numbers to leverage the argument for a new runway. Delay data for the EIS/EIR was utilized from figures that were produced in 1996 when delays were at a high rate; however, the delays between 1996-1999 have seen yearly reductions and the figures in the report are not an adequate representation of the current situation at Logan.

89.2

Public health and the quality of life of residents and their communities must be the priority for city and state governments. Each and every resident has the right to enjoy the quiet surroundings of their environment. The airport is negatively impacting the surrounding communities. Exhaust fumes, noise, congestion and poor air quality are serious environmental and public health issues that must be addressed by the Massachusetts Executive Office of Environmental Affairs.

89.3

Air traffic on Runway 27 will triple with the new configuration of 14/32 thus increasing flights over Roslindale, Hyde Park, Jamaica Plain and West Roxbury. This is unacceptable and this item has not and probably will never be part of Massport's presentation to the communities mentioned above. At a recent community meeting in Jamaica Plain on March 22, 1999, this issue was ignored by Massport. Representatives only repeated their arguments for a new runway. Again, Massport is far more concerned with the "bottom line" than the lives of families in and around Boston. However, they do have a plan of action for the Upland Sandpiper and other wildlife at the airport!

89.4

While I believe there is no need for a new runway at Logan Airport, I also believe that the best solution for capacity and delay concerns at Logan is achievable at Hanscom Air Field. Hanscom is another issue that is not a part of the Massport presentation when mentioning a regional approach to air transportation issues. Worcester, Manchester, and T.F. Green Airports are mentioned as part of this regional approach; however, Hanscom is not mentioned and this truly is a slap in the face to the affected communities around Logan Airport. This airfield is expansive and provides the best solution to Logan's problems today and in the future.

Massport is protecting Hanscom and the surrounding communities by eliminating Hanscom as a viable alternative. Simply put, Massport is employing a "divide and conquer" strategy in Massachusetts. Massport and state government officials have protected these residents for quite some time at the expense of our communities here in Greater Boston. They have not fairly shared the burden with their fellow citizens in and around Boston. This situation is indeed reprehensible and unjustified.

89.5

Many current airport operations can be relocated to Hanscom with Massport increasing its capacity at Logan and thus reducing delays as well. General aviation aircraft, cargo operations and shuttle services to New York, I believe, can be shifted to Hanscom. Passengers who utilize the shuttle services are predominantly from communities in the 128/495 area of our state. The burden can and must be shared by all in Massachusetts not by a few as is the case now. If Massport fails to expand Hanscom Field operations, Logan Airport will be at the same juncture as we are today in 5 years or less with increased delays, congestion, noise and pollution.

Massport's arrogance is certainly well known in the Boston area and we have had enough. The time has come for Massport to finally recognize that all its research, money and influence will never stifle the opposition on this issue. Massport continues its strategy of manipulation employing an air of superiority. Opposition members remember the long, hard fight of the 1970's and most are experienced veterans who are just as committed to opposing this ill-conceived proposal. They are willing to continue the struggle for fairness and for their rights to live in a safe, healthy and peaceful environment.

I certainly hope my comments will create doubt about this flawed project and MEPA will do the right thing and support the residents' position and opposition to Runway 14/32. Rejecting the EIS/EIR will validate the concerns of area residents and force Massport to deal on a level playing field for a change. Boston and surrounding communities will not take a back seat and ignore the injustices perpetrated by Massport.

I strongly oppose this proposal and it is my hope that the concerns of so many residents of our Commonwealth resonates with MEPA staff and I urge your department to reject Massport's Environmental Impact Report and Study.

89.6

Thank you.

Letter 89

Community Advisory Committee Representative, Roslindale/Hyde Park

Alex Geourntas

Code	Topic 1	Topic 2	Comment	Response
89.1	Noise	Impacts	The cumulative effect of airplane noise and exhaust is an environmental concern... Massport...continuously ignores the impact the airport is having on the surrounding communities....	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPP</i> and its updates.
89.2	Delay	Model	The "delay" argument is not persuasive [sic]...the figures in the report are not an adequate representation of the current situation at Logan.	<p>The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available.</p> <p>Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.</p> <p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate <i>and long-term</i> benefits by lowering runway delays by 38,000 hours under 1998 conditions, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. The sooner airside efficiencies are implemented, the more benefits will accrue over time.</p>

Code	Topic 1	Topic 2	Comment	Response
89.3	Public Health	Effects	Exhaust fumes, noise, congestion, and poor air quality are serious environmental and public health issues that must be addressed....	<p>No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.</p> <p>Consistent with the request made by EOE in its Certificate, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative. A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR.</p> <p>Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport may not reach the 1999 passenger forecast (29 million) presented in the Airside Project Draft EIS/EIR until 2002 or 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts will not be achieved until after 2020. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a complete discussion of the planning forecasts.</p> <p>The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.</p>
89.4	Noise	Runway Use	Air traffic on Runway 27 will triple with the new configuration...This is unacceptable....	<p>The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain essentially the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts. Total departures from Runway 33L and arrivals to Runway 15R (over East Boston and Chelsea) would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below the annual goals for these operations. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.</p>

Letter 89: Community Advisory Committee Representative, Roslinde/Hyde Park, Alex Geourtas

April 15, 1999

Arthur Pugsley, Associate Environmentalist
MEPA Unit
Executive Office of Environmental Affairs
20th Floor
100 Cambridge Street
Boston, MA 02202

LETTER 90

Dear Mr. Pugsley:

Re: Logan Airside Improvements Planning Project
Massport Environmental Impact Report
Case No. 11895

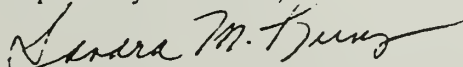
As the Town of Braintree's Representative to the Community Advisory Committee to Massport (CAC), I hereby register my support of Review Comments re the above-entitled project as prepared by the CAC Consultants, Robert G. Burns, Monty Gettys, Montgomery Consulting Group, Inc. and David Standley, P.E.

Because Massport has failed to provide a long-term plan and has chosen instead to settle for a short-sighted one that will adversely affect those of us who live under the flight paths, I, as the Town of Braintree's Representative to the CAC, hereby vehemently oppose the Logan 2000 Project in general and the construction of the proposed new runway 14/32 in particular.

Therefore, I urge MEPA to reject Massport's Environmental Impact Report and require said agency to redo the EIS/EIR, as I believe that data contained therein is flawed and unreliable.

90.1

Respectfully submitted,



Sandra M. Kunz
Braintree Representative to Community Advisory Committee to Massport
Certified Mail, Return Receipt Requested

Mailing Address: 89 Hollingsworth Avenue
Braintree, MA 02189

Letter 90

Community Advisory Committee Representative, Braintree

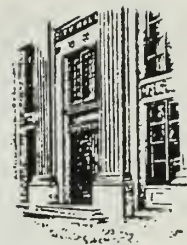
Sandra Kunz

Code	Topic 1	Topic 2	Comment	Response
90.1	Environmental Review Process	MEPA	...I urge MEPA to reject Massport's Environmental Impact Report...as I believe that data contained therein is flawed and unreliable.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.



City of Quincy, Massachusetts
City Hall

JAMES A. SHEETS, MAYOR



JOHN F. KEENAN
EXECUTIVE SECRETARY

BERNICE C. MADER
ADMINISTRATIVE ASSISTANT

LETTER 91

April 21, 1999

**Robert A. Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge St. Room 2000
Boston MA 02202**

Re: Runway 14/32 Logan Airport - EOE 10458

Dear Secretary Durand:

Enclosed find a copy of the comments I made at the FAA/MEPA hearings of April 7, 1999. I hope that the arguments and reasoning advanced will convince you to declare Massport's current draft EIS an inadequate one.

In brief, their data are old; they used their own rather than the FAA's formula to model delays. They have data from 1998, why don't they use it?

They did not differentiate among the types of delays, delays being the basis of their support for the runway. They lumped all delays together. They did not separate out those delays in which the entire airport was shut down due to snow or fog [six extra runways will not help in those circumstances].

They did not indicate which airlines were most delayed. The national list, just published yesterday, identified which airline companies are most delayed due to their own internal organizational deficiencies. Many of the most delayed airlines are the ones who do the most business out of Logan - United, American, US Air. The least delayed airline, Southwest, is the main carrier at TF Greene and does not run out of Logan.

They did not indicate how many delays are incurred by Logan passengers who twiddle thumbs on the ground because of Massport's managerially inept systems for baggage handling as well as chronically back dated, or entirely missing, departure and arrivals screens, or unreadable or useless wayfinding signs. I defy all passengers to find the one Northwest Airlines gate at Logan unless they know where it is ahead of

91.1

April 21, 1999
Mader to Durand
Runway 14/32
Page 2

ahead of time, in the far corner of the International terminal, with no sign and no reception area. Do we blame that kind of ill planning on lack of a runway too? Massport does not have its act together as an agency. Period.

Massport dismissed all consideration of other alternatives in less than a few pages; they made no sincere effort to find a real solution to the overall problem. That problem is much greater than Logan's needing another runway. Logan Airport is too small now and certainly too small for the future. They chose to completely ignore that reality.

91.2

I hope that you will find my comments helpful, not so much because they have answered all the questions that need to be addressed, but that they have spoken to the many, many more questions which need to be raised and satisfactorily answered.

Thank you for your consideration in these matters.

Sincerely,


Bernice C. Mader

Administrative Assistant to the Mayor

April 7, 1999

**To: The Staff of the Executive Office of Environmental Affairs
The MEPA Unit
The Commonwealth of Massachusetts**

**From: Bernice C. Mader, City of Quincy Representative
Community Advisory Committee to Massport**

Re: Massport EIR Logan Expansion/Logan 2000

OVERVIEW

I address you here as the Quincy Representative to the Community Advisory Committee as well as the President of Citizens Against Airport Noise and immediate past chair of the CAC, for nineteen years.

During this project, Massport has violated both the spirit and the regulations of the EPA, MEPA, and the FAA as well as the sense of fair play and environmental justice. The NEPA/MEPA process, when used wisely and honestly, can be a helpful learning and planning tool for diverse groups of opinion makers to reach consensus but not the way that Massport has tried to manipulate its use.

91.3

As I will later recount, Massport has used both outdated and worst case scenario data as their base case and they have employed highly irregular data-gathering methodologies. Massport's EIR generates very little new knowledge, nor does it advance forward-thinking, thoughtful public policy.

91.4

Massport never examines Logan Airport itself as it now exists. They talk extensively about delays but they never mention the real problem at the airport - its size. A newly created international airport based on only minimally acceptable federal standards would contain at least 5,000 acres and many have 10,000 acres or more. In contrast, Logan Airport consists of 2,400 acres. That is only 48% of the minimum physical size of any new airport created today.

91.5

No major physical improvements had been made to Logan from 1977 until this past year when the new parking garage opened. To allow Logan International Airport to be able to continue to operate, Massport has stretched every airport parameter to its limit and beyond. Logan Airport is too small now and certainly too small for the twenty-second century. No 5,000 foot, uni-directional commuter runway can address Logan Airport's overwhelming shortcomings. It has no more room to grow.

Parking, ground access, pedestrian access, off site park and flys, off site cargo terminals, re-located fuel lines and outrageously difficult wayfinding and signage systems are now at their extreme limits. This postage stamp-sized major commercial airport is now trying to squeeze in another runway to once more accommodate its basic lack of adequacy. The growth of the commercial passenger industry over the past two decades has outstripped Logan Airport. Logan International Airport, in the site where it is currently located, has run out of space, time and capacity.

A large number of cities both in this nation and across the world observed the trends in aviation growth and planned for them. Massport did not. Airport studies were conducted in 1988, 1990 and 1993, the last led by Bud Snyder at the Mass. Aeronautics Commission. Studies are not plans. Those studies were casually disregarded, and discarded, for a variety of reasons - mostly political. Massport clearly did not formulate a comprehensive Master Plan for Massachusetts' aviation needs of the twenty-second century. Instead, it employed a series of stop-gap measures to patch its inadequate infra-structure systems. Massport continues to try to put twenty pounds of flour into a five pound bag.

As one reads the EIR, it is clear that Massport has not fully answered the requirements of the EIR process. CEQ, sec. 1502.14 is the heart of the process. This is the examination and consideration of alternatives. From the issuance of their initial document in the summer of 1995, Massport has listed individual alternatives and bundles of alternatives, but it was as abundantly clear then as it is now, that Massport had a chosen "favorite" for which it would develop and skew supporting data. The coverage given to the listed alternative choices is complete lipservice, such as Hanscom Field, two and one half short paragraphs; five paragraphs to dismiss video teleconferencing and only three paragraphs to dismiss the north south rail link, the Portland rail link and the northeast corridor improvements combined. Completely absent from all consideration is the other wholly ignored alternative, the development of a new airport. Massport wanted the shoe to fit no matter how they had to cram that foot into the glass slipper.

91.6

Section 1502.14 (a) requires Massport "to rigorously explore and objectively evaluate all reasonable alternatives"; "to present the environmental impacts of the proposal and the alternatives in comparative form"; (b) "to devote substantial treatment to each alternative considered in detail"; (d) "agencies shall include the alternative of no action". In 1502.15, the EIS shall *precisely* describe the environment of the area itself and the area around it that "is to be affected or created by the alternatives under consideration". They "shall discuss the relationship of the proposed actions to adopted or proposed land use plans, policies, controls, and goals and objectives of affected communities, including communities outside the jurisdiction in which the proposed project is located." 1502.14 says that "it shall include discussions of direct effects and their significance and indirect effects and their significance."

Massport has not adequately responded to these requirements. Instead of sincerely and fully examining these regulatory edicts, Massport and its management, for almost the past two years, has chosen to go out and lobby publicly for its alternative of choice - a new runway 14/32 and a new centerfield taxiway. Their study is inadequate and outdated and incomplete. It needs to be re-done.

Executive Director Blute has made dozens of presentations to the state's Congressional delegation, private companies, a variety of Chambers of Commerce and special interest organizations like Associated Industries of Massachusetts, the High Technology Council, the New England Council and many local civic organizations. These presentations all occurred during the period in which Mr. Blute had publicly assured the joint Logan Airside Review Committee (ARC) that he was "going to look at all of the alternatives and get back to the ARC." Despite Mr. Blute's public pledge in August of 1997 to "neutrally examine all of the alternatives", within a few weeks after that pledge, Mr. Blute was in Washington advocating the runway to the federal Congressional delegation as well as to the East Boston Chamber of Commerce.

The ARC is composed of the Community Advisory Committee to Massport, which consists of citizen representatives from 24 communities formally appointed by their mayors or Boards of Selectmen, along with an equal number of private businesses and airline companies appointed by the Executive Director prior to Peter Blute, Stephen Tocco. The ARC was the formal, recognized Massport-designated team of both sides. Its mission was to listen to, and to question, in each other's presence, Massport's consultant team's data for the EIR.

Over an 18 month period, when I was still chair of the ARC, and later my successor, Anastasia Lyman, almost monthly calls were placed to Peter Blute and/or his Director of Aviation Planning, Betty Desrosiers, asking them where he was in his analysis. The answer always came back that "he was examining alternatives".

We citizens came to know differently as we learned that Mr. Blute was lobbying various forces for his alternative of choice. He was making favorable presentations of Massport's choice to many local civic groups, by-passing the officially appointed ARC. Mr. Blute preferred to speak to uninitiated citizen and business groups who had neither the background, the history or the information to ask him pointed and probing questions.

During this 18 month, unexplained hiatus from the EIR process, the ARC members received no information from the Massport consultant team. Citizens were told that Massport consultants and the FAA were "gathering data" and "working on things". We all know that they were not gathering data for had they done so, then this EIR would not be based on six year old information from a worst case scenario base year which used the worst year for delays that Massport has ever had.

When the EIR process suddenly resumed in 1998, just days after the state elections, the ARC members were not made aware of its start up or of any new data the Massport consultant team was developing. We were again circumvented from being part of the formal process. The holidays came and went, and a short week into the new year of

1999, Anastasia Lyman, the current chair, received a call from Massport, after a 20 month suspension of activity, that Massport wanted to schedule one last ARC meeting within a week to "sign off on the final draft".

ARC members were outraged and rightfully so. Some data that had been used in the EIR were now over six years old. Neither citizens, nor their consultant advisors, were due to receive their copy of the Draft until the day before the ARC meeting. The Draft weighs many pounds and measures several inches. Over and over we are told, trust the Massachusetts Port Authority. Would you?

DELAYS

When it began its public relations campaign after the state elections, Massport again based its case for the new Runway 14/32 upon the reduction of delays as being the most significant factor affecting Logan's ability to operate. For not only reasons of lost time but for what Massport said was \$313 million dollars in lost revenue, Massport said that it must have a new runway as the only way to address these issues. Let us examine their arguments:

When Massport chose its base year for delays it chose the single worst year for delays that had ever occurred. That base year, 1993, was neither indicative nor typical of a normal year. In 1993, Massport incurred 19, 729 flight delays. Delays have never again approached that level. As it is, less than 4% of all flights at Logan are delayed.

91.8

If one examines the weather for 1993-1994, one would also find an unusual winter weather pattern. There were over ten significant winter snowstorms right after each other in that year. The snowfall of 96.3 inches [data obtained from U.S. Weather Service Information Bureau] set a record. The snow did not melt until mid-May.

In its delay section, Massport does not clearly delineate which portions of the delays caused by "wind and weather" were specifically attributable to snow, ice or other severe weather conditions which would have caused delays, such as the closure of runways or the airport itself, regardless of the existence of the number of runways.

When it evaluated the delay situation Massport did not use the FAA method of calculation, which counts any flight as being delayed if it is over 15 minutes late. Massport added up every minute of delay, compressed those minutes into hours and then assigned those hours a dollar value. They said that the cost per lost hour to airlines was \$1,115 and \$27 per plane passenger based upon a 1997 DOT study. The grand total in 1998 of the cost of delays was said to be \$313 million dollars. There is no detail as to how those figures for either the planes or the passengers were arrived at except to quote the DOT

91.9

study. What methods were used by DOT and Massport to determine those numbers?

Though Massport has quantified the delays of airline passengers and airlines in terms of U.S. currency, they have imagined the delay impacts for those living on the ground as being only environmental, with no economic effects. That is a mistake.

THE "INTERRUPTION DELAY FACTOR"

If Massport builds Runway 14/32 for use by commuter planes, then we believe that that action creates more slots for the airlines to fill with larger jet operations on the other runways. That will create more rather than less noise at the airport.

Building 14/32 might temporarily reduce runway delays for about 3-5 years but it will also increase what I will call the "interruption delay" factor for those who live under the flights. In fact, my "interruption delay" model demonstrates that an enormously greater amount of money is lost to the business economy by the "interruption delay factor" than Massport's estimated losses to airlines and their passengers ever will. Let me explain.

The "interruption delay factor" represents the costs to businesses and workers who work on the ground under the noise of the flight paths. Their losses can be quantified in the following way:

Last year in 1998, there were 483,000 Logan flight operations, that is take offs and landings. Those operations rumbled over Boston's 19 neighborhoods as well as the other 18 municipalities which also experience direct impacts from Logan's existence. Using 1998 census data from the Commonwealth of Massachusetts, if one totals the number of citizens just referenced, that number is 1,465,800 people living under one or more of Logan's flight paths. If one adds those workers who commute to Boston to the number of Boston residents, the correct figure including those who drive via the S.E. Expressway, Route 93 S, the Mass Turnpike, Route 1, and those who ride the Commuter Rail systems and the various MBTA Rapid Transit lines to Boston to work, that total number approximates on an average work day, 838,000 people living under the noise from Logan's flight paths in the City of Boston alone and 1,675,800 persons living under them across all the affected communities.

91.10

Assume that 62% of those people work, then slightly over one million people toil under the flight path noise on a given day. According to the latest census information, the average annual income in Boston, [which is lower than many of its surrounding neighbors] is \$37,740 or \$18.14 hour. However, because I want this analysis to be of the most conservative nature, I have arbitrarily chosen the rate of \$7 per hour as being the average lowest going rate for an hourly job in Boston.

The next step in the model is to assess how many people on any given day suffer the effects of Logan's noise pollution. Not all of the people who live and work in Boston are affected by airplane noise all of the time. It is not unreasonable to say that one-third of the "working" population of 1,055,750 may be affected by Logan operations at any one time. The given one-third would also not be affected every day but perhaps three days out of every seven on average and not necessarily for 12 or 18 hours a day but perhaps 6 hours.

In summary, that means that one third of a million people live under flight path noise for three + - days per week at about + - six hours per day. If we model the following circumstances, as Massport models so many things including their delay costs, this is what happens:

Suppose that during the six hours of airplane noise per day, that within each hour, there are five interruptions, averaging one minute per interruption. These interruptions might be one minute pauses for inaudibility during telephone conversations, required verbal repetitions of sales orders or merchandise picking orders, intrusions during business or staff meetings or between agents and clients or sales people and customers.

At five minutes per hour times six hours per day, that is 30 minutes of interruption delays per day. If I take that one day and multiply it by the three days of noise, then each worker will have experienced 90 minutes of interruption delays within a given week. If we then examine the total group of affected workers losing productivity, at \$7 per hour, the dollar amount represented by those lost productivity hours per week equals \$11,085,375 and \$576,439,500 per year! That is at the lowest possible hourly rate of the \$7. If I actually used the probable closer to real cost per hour figure of \$18.14 per hour, then the loss would be \$29,883,004 per week or a staggering \$1,553,916,156 dollars per year! Massport's \$313M quantification of passenger and airport delays represents only 20% of the "delay interruption penalties" incurred by those who work on the ground.

My model has only addressed the money lost. How do I even begin to quantify the hours of lost sleep, inaudible school lessons, interrupted speech, unavailable enjoyment of the environment, not to mention the negative health effects of high blood pressure, stress, hearing loss and low birth weight babies?

THE PREFERENTIAL RUNWAY ASSIGNMENT SYSTEM [PRAS] GOALS

In the early 1980s, the members of the Massport Community Advisory Committee proposed to Massport that there be an effort to distribute the noise from Logan operations more equitably among the affected communities. Citizens worked with

Massport consultants to come up with a workable model. The model took into account these main factors: the seasonal use and dis-use of certain runways, the use of any runway for more than 8 hours in a 24 hour period called "dwell", and the use of any runway for more than 24 hours within a 72 hour period, called "persistence". It also highlighted the use of over-water landings and take offs as a possible relief for suffering communities. The computer model was supposed to alert air traffic controllers in the tower when any runway had been used over 8 hours in one day, 24 hours in three days or had been on any combination of runways for a long period. If wind and weather permitted, the controllers were supposed to change the runway combination creating relief for those who had been enduring noise for days or hours on end.

Initially, for the first 3-4 years, there was some effort by tower personnel to use the system. However, as the demand at Logan for more and more flights continued to grow, tower controllers began to use more and more of the high capacity runway combinations to accommodate the increased numbers of planes and to ignore the recommendations of the PRAS computer model. For the past eight or nine years, the model has been ignored altogether in favor of tower personnel's being able to "get 'em in and get 'em out" of the airport.

Since Massport's professed arguments for the new runway 14/32 are generally weak and without merit, they had to find some ideas to bolster their new runway argument. Massport refuses to admit that 14/32 is simply a bottom line revenue issue allowing them to accept more new business. After almost a decade of ignoring the entire PRAS idea and its operation, Massport chose to resurrect PRAS's long-ignored noise sharing goals and its stated intention of trying to encourage flights to Logan to come via over the water approaches. Since runway 14/32 borders the harbor, Massport chooses to assert that all of its uni-directional commuter flights would enter and leave Logan via the harbor approach.

91.11

What Massport does not say or clearly demonstrate is where those thousands of new commuter operations will turn back over land. With all of the flights purported to be commuter or corporate sized, the airplane turns from the harbor back over land will be not be conducted at high altitudes, many miles away in the harbor. They will instead turn quickly, generating new noise over already noise-enduring communities. The PRAS part of Massport's 14/32 argument provides no relief at all. In fact, the former PRAS experiment never met more than about 26% of its goals - and that was when the number of operations was far less than now.

Massport refuses to guarantee that it will come one iota closer to meeting those 18 year old PRAS goals, which include "noise abatement", with runway 14/32. It simply creates new opportunities for more noise.

Should Massport plans go forward, then EOE/MEPA and FAA should impose substantial fines on Massport for not meeting the PRAS guidelines with communities receiving the monies.

A UNI-DIRECTIONAL RUNWAY 14/32

One of the strongest contentions accompanying Massport's argument for the new runway is its assertion that this runway will never be used in any way but uni-directionally, all operations coming in from, and going out over, the water. Massport swears that the other end of the new runway will never be used to launch operations directly over neighborhoods.

On three public occasions, I personally have asked Massport to quantify this promise by agreeing to create a legal instrument which attests to the uni-directional nature of 14/32 and which forbids its use in the other direction in perpetuity. I have also asked that such a legal instrument become part of the Record of Decision of the FAA in the runway matter should it be built. Massport has refused to agree to this. Given previous history, there is no reason whatsoever to believe Massport's assertion of uni-directionalism their latest version "Trust us". Look at the court case right now where they are trying to remove the previously agreed to injunction against building a new runway.

91.12

USE OF GREENE, MANCHESTER, WORCESTER & HANSCOM AS RELIEVER AIRPORTS

Massport says that it has encouraged use of these facilities as a way to ease Logan's woes. In fact, it actually has not. Greene and Manchester airports have grown because of market forces and ease of use. Cheap airfares, such as those offered by Southwest Air, have lured thousands to Greene. Easier traffic and commuting access to Greene and Manchester have appealed to the flying public. Massport has not once ever launched a public relations initiative to guide business to these competitors. In the absence of a comprehensive aviation plan, and in being criticized for the lack of one, Massport has backed into naming Greene and Manchester as relievers because it suits their purpose, not because they really planned to have them act in those functions.

Additionally, Massport decries the lost \$313 million in delay costs but at the same time claims that it seriously supports sending thousands of paying customers to Rhode Island or New Hampshire. Massport is a business. Do you believe that it honestly wants to send business elsewhere on a regular basis?

As for Worcester Airport, for 15 years, CAC members have tried to get Massport interested in developing this facility which has major potential. Instead, Massport has treated Worcester like a leper, allowing its annual passenger use to fall from vigorous levels to a mere 39,000. To be blunt, Massport has not cared about Worcester because

It does not own Worcester. Worcester does not contribute to Massport's bottom line. If Massport is serious in its claims about Worcester Airport, then it will acquire Worcester and work with the Massachusetts Highway Department to build a direct connector road from the Massachusetts Turnpike to the airport.

There are those who will respond to that proposal by saying that doing that would take ten years. Under normal regulatory processes, that would probably be so. However, in the public's interest, those processes can be changed and compressed. A perfect example of this is what occurred because of the demands of the Central Artery project. In order to serve the public's interest and to save the taxpayers money, the Commonwealth wished to deposit the dirt from the Central Artery at the former Quincy/Milton landfills for the Quarry Hills Golf Course project. To do so, the entrance ramp off of the South-east Expressway had to be closed and moved so that it could accommodate the hundreds of large 18 wheeled trucks delivering the dirt every day. In a period of six weeks, the old ramp was closed, the new ramp design approved and the new ramp built and opened. Normally this would have been a three year or more process. If state government, working with the FAA, has a will to make Worcester functionally important for commercial aviation, it can do so and do so quickly. The commitment and the money just have to be provided.

91.13

As for Hanscom Field, Massport seems loathe to seriously investigate this wealthy, politically powerful alternative. We must examine what Hanscom can contribute to the solution. It has two parallel runways with instrumentation and length that are perfectly suited to commuter aircraft. In fact, it offers double the advantages of a runway 14/32 at Logan. No one should propose that large-scale jet operations emanate from Hanscom, but it does offer a perfectly suited, already existing facility for the commuter traffic that Logan is so anxious to eliminate.

A NEW AIRPORT

Even if the new runway is built, Massport has not addressed how passengers will get there to use it. There are still only the same number of roads in and out. Multi-modal techniques of getting passengers to the airport have grown but in no way have they been able to keep pace with the rise in private automobile traffic to Logan. Despite the new garage, adequate parking will continue to be a problem. Pedestrians will continue to navigate at their peril at this airport. Airport emissions will still waft into abutting neighborhoods.

In this EIR, Massport never even considered the idea of building a brand new international airport. That is a mistake. They must at least seriously consider the concept. Whether there are land parcels in Massachusetts large enough to accommodate such a facility needs to be investigated. Whether an airport can be built on any of them needs

91.14

to examined. To completely dismiss the idea out of hand is not within the intent of the MEPA guidelines for alternatives.

SUMMARY

- Massport has not followed the NEPA/MEPA regulations and guidelines in how it has produced this report. It has done a very poor job of examining alternatives and pursuing them in any meaningful depth. The report must be done again. 91.15
- Massport has chosen out-dated and worst case scenario delay data to bolster its case for the new runway 14/32. Its data analyses were not based upon normal FAA data-gathering methods. Less than 4% of all the flights at Logan are delayed. 91.16
- The land upon which Logan International Airport stands is too small. It cannot handle any more runway growth. It is out of space for any type of additions. 91.17
- Massport's administration has circumvented and dishonored its own citizen and business group, the ARC, by ignoring the ARC's stated mission and by trying to manipulate the MEPA process to its advantage rather than using the EIR process to produce good, new information and enlightened public aviation policy. 91.18
- Massport has been greatly concerned with last year's \$313 million loss which they assert has been incurred by delays to both the airlines and the passengers. In fact, their figure is only 20% of what workers and businesses on the ground have incurred as part of the "Interruption delay factor". That amount of money may be as great as one billion dollars or more per year. 91.19
- Massport has resurrected the unused-for-a-decade Preferential Runway Assignment System to bolster their weak arguments for a new runway. Should Massport's plans come to pass, then the Authority must be substantially fined for not meeting those goals with the funds going to affected communities.
- Massport refuses to incorporate a legal document into the FAA Record of Decision that swears that runway 14/32 will be used uni-directionally in perpetuity. 91.20
- Massport has used Greene and Manchester Airports' growth as a fallback to defend its lack of a comprehensive aviation planning document for Massachusetts for the twenty-second century. 91.21

- **Massport claims to have sincere interest in developing Worcester Airport's potential. If that is so, let them advocate for a compressed development timeframe and the funds necessary for Massport to purchase the airport, increase its infrastructure and build a linking highway to the Massachusetts Turnpike.** 91.22
- **Massport must examine the potential use of Hanscom Field as the major operator for commuter operations for Massachusetts. That does not include large scale jet traffic.** 91.23
- **As one of the considered alternatives, Massport must study the prospect of siting a new major international airport in Massachusetts.** 91.24

When it comes to Logan Airport, Massport has used the "Field of Dreams" philosophy of aviation planning - "build it and they will come". But how will they come, and where will they park, and how will they walk, and how will the neighbors thrive and hear their children laugh, and how will all of the long-suffering citizens enjoy the "Life, liberty and pursuit of happiness to which we all are heir"?

EXHIBIT ONE - BERNICE MADER TO EOE/MAPA - LOGAN EIR
POPULATION FIGURES BASED UPON COMM. OF MASS. CENSUS DATA 1998

BOSTON/INC. ALL NEIGHBORHOODS & OTHER COMMUNITIES AFFECTED BY LOGAN
Boston (inc. all neighborhoods East Boston, South Boston, Roxbury, South End, Back Bay, Jamaica Plain, Dorchester, Hyde Park, West Roxbury Roslindale, North End, Grove Hall, Fields Corner, Uphams Corner, Codman Square, Mattapan, Brighton and Allston.

=	628,400
Braintree	32,800
Brookline	55,700
Cambridge	101,500
Chelsea	34,900
Everett	35,700
Hingham	19,900
Hull	11,200
Malden	55,900
Medford	57,000
Melrose	27,000
Milton	25,700
Newton	82,400
Quincy	89,800
Revere	44,200
Somerville	79,000
Swampscott	13,400
Weymouth	54,100
Winthrop	17,200
Grand Total	1,465,800

EXHIBIT TWO - BERNICE MADER TO EOE/MEPA - LOGAN EIR

MODEL FOR "INTERRUPTED DELAY" FACTOR

Boston's population of 628,400 [1998 census data]

Add 222,000 daily in-bound commuting workers

Subtract 12,000 people who live in Boston and work elsewhere

Total of 838,400 people in the City of Boston work under the noise

Add the populations from the other 18 communities, which is 837,400, to the 838,400

Total population under the flight path noise 1,675,800 [This figure is adjusted downward by 12% to account for those people who might live in affected communities and also work in Boston.]

Approximately 62% or 1,055,750 of the 1,675,800 work under the flight paths.

Boston's average annual income [census data, 1998] \$37,740 which is \$18.14 per hour based upon a 40 hour work week at 52 weeks per year

Model's conservative rate per working hour is \$7.00

Formula Steps:

1/3 of the 1,055,750 or 352,000 + - people receive noise for 3 + - days x 6 + - hrs./day

5 minutes of interruptions for each of the 6 hours = 30 minutes of interruptions per day

3 days of 30 minutes of interruptions = 90 minutes of interruptions

90 minutes of interruptions for 1,055,750 persons = 95,017,500 minutes of lost work

Those 95,017,500 minutes convert to 1,583,625 hours of lost work

At \$7.00 per hour, that = \$11,085,375 per week in lost work

\$11,085,375 x 52 weeks per year = \$576,439,500 per year in interruption delay costs

At \$18.14 per hour, the 1,583,025 hours of lost work = \$28,716,075 per week

At \$28,716.075 per week x 52 weeks = \$1,493,235,822 per year in interruption delay costs to those businesses and workers who work on the ground under the noise

This model has used a similar technique to the one Massport used to arrive at the \$313million of losses attributed to passengers and airlines at Logan

Massport's loss figure of \$313 million is only 20% of the losses to those on the ground

Code	Topic 1	Topic 2	Comment	Response
91.2	Regional Transportation	Regional Alternatives	Massport dismissed all consideration of other alternatives in less than a few pages....	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i> , published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i> . The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i> , published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
91.3	Environmental Review Process	MEPA, FAA/NEPA	...Massport has violated both the spirit and the regulations of the EPA, MEPA, and the FAA....	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p>
91.4	Delay	Model	...Massport has used both outdated and worst case scenario data as their base case and they have employed highly irregular data-gathering methodologies.	<p>In response to the request made by the EPA, as well as by EOE in its MEPA Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year.</p> <p>A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
91.5	Purpose and Need	Delay	Massport never examines Logan Airport itself as it now exists. They talk extensively about delays but they never mention the real problem at the airport — its size...is only 48% of the minimum physical size of any new airport created today.	Massport is constantly examining Logan Airport's current and future needs. The 1999 <i>ESPR</i> (previously <i>GEIR</i>) is the latest in a series of intense reviews. Logan Airport's real estate is admittedly less than the desirable size. Since the existing area cannot be expanded, Massport proposed the Airside Project and is investigating other redevelopments to maximize efficiency. Runway 14/32 will be located on fill that was prepared for this purpose 25 years ago. The runway will not increase airfield capacity, but will dramatically reduce aircraft and passenger delays during northwest wind conditions.
91.6	Regional Transportation	Regional Airports	Massport clearly did not formulate a comprehensive Master Plan for Massachusetts' aviation needs of the twenty-second century. As one reads the EIR, it is clear that Massport has not fully answered the requirements of the EIR process. The coverage given to the listed alternative choices is complete lipservice [sic]...Their study is inadequate and outdated and incomplete. It needs to be re-done.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
91.7	Environmental Review Process	Public Process	Concerned about how Massport handled the public process.	<p>There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

Code	Topic 1	Topic 2	Comment	Response
91.8	Delay	Model	When Massport chose its base year for delays it chose the single worst year for delays that had ever occurred. That base year, 1993, was neither indicative nor typical of a normal year...The snowfall of 96.3 inches...set a record...Massport does not clearly delineate which portions of the delays caused by "wind and weather" were specifically attributable to snow, ice or other severe weather conditions....	<p>In response to the request made by the EPA, as well as by EOEA in its MEPA Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year.</p> <p>A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR.</p> <p>The delays analysis used ten years of weather data so the characteristics of the weather in a single year did not strongly influence the results.</p>
91.9	Delay	Model	...Massport did not use the FAA method of calculation...the cost of delays was said to be \$313 million dollars...What methods were used by DOT and Massport to determine those numbers?	<p>Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. It includes a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.</p> <p>The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...."</p> <p>The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States. Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.</p> <p>The cost of delay analysis presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is based on a methodology recommended by the FAA. The cost of delay to a passenger (\$27 per hour) is a weighted average cost for business and leisure passengers. Refer to FAA APO Bulletin APO-97-1.</p>
91.10	Noise	Impacts	...they have imagined the noise impacts for those living on the ground as being only environmental, with no economic effects. That is a mistake.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives.</p> <p>According to 40 CFR Part 1502 Environmental Impact Statements Regarding Cost-Benefit analysis "for purposes of complying with the act, the weighing of the merit and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis..."</p>

Code	Topic 1	Topic 2	Comment	Response
91.11	Noise	Runway Use	...Massport chooses to assert that all of its uni-directional commuter flights would enter and leave Logan via the harbor approach. What Massport does not say or clearly demonstrate is where those thousands of new commuter operations will turn back over land.	The turboprop departures from Runway 14/32 are shown on Figure 6.2.4 of the Airside Project Draft EIS/EIR to cross the harbor and then the South Shore in areas that, for the most part, are currently overflown. Jets are shown on Figure 6.2.3 of the Airside Project Draft EIS/EIR to depart over the harbor, just as jets departing Runways 22L, Runway 22R, and Runway 15L do currently. The jets recross the North and South Shores in the same areas and altitudes as do the current departures from Runway 22L, Runway 22R, Runway 15L, Runway 9, and Runway 4R.
91.12	Alternatives	Runway 14/32	...there is no reason whatsoever to believe Massport's assertion of uni-directionalism....	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Appropriate supporting documentation will also be issued (<i>e.g.</i>, appropriate designations in the Airport/Facility Directory, and Notices to Airmen or NOTAMS).</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. Refer to Section 8.7 of the Supplemental DEIS/FEIR Draft Section 61 Findings, and the discussion in Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.</p>

Code	Topic 1	Topic 2	Comment	Response
91.13	Regional Transportation	Regional Airports	If Massport is serious in its claims about Worcester Airport, then it will acquire Worcester and work with the Massachusetts Highway Department to build a direct connector road from the Massachusetts Turnpike to the airport...We must examine what Hanscom can contribute to the solution.	<p>The <i>Logan Airport 1999 ESPR</i> (previously GEIR) reports on Massport's Alternative Fuels Vehicle program and on Massport's efforts to encourage the use of alternative fuel vehicles.</p> <p>Massport supports improved ground access to Worcester Regional, T.F. Green/Providence, Manchester and Logan airports. These projects are discussed in Section 2.9 of the Supplemental DEIS/FEIR. Since passengers do not travel between New England's regional airports, (e.g., passengers do not first go to Manchester Airport before driving to Logan Airport) it is not clear why improved access between the regional airports would generate any benefit.</p> <p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.</p>
91.14	Regional Transportation	Regional Airports	...Massport never even considered the idea of building a brand new international airport. That is a mistake. They must at least seriously consider the concept.	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
91.15	Environmental Review Process	FAA/NEPA MEPA	Massport has not followed the NEPA/MEPA regulations and guidelines...It has done a very poor job of examining alternatives....	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i>, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i>. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i>, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.</p>
91.16	Delay	Model	Massport has chosen out-dated and worst case scenario delay data....	<p>The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available. 1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative. The planning scenarios for 29, 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 1999 to 2020 time frame.</p>

Code	Topic 1	Topic 2	Comment	Response
91.17	Alternatives	Runway 14/32	The land upon which Logan International Airport stands is too small. It cannot handle any more runway growth.	Logan Airport's real estate is admittedly less than the desirable size. Since the existing area cannot be expanded, Massport proposed the Airside Project and is investigating other redevelopments to maximize efficiency. Runway 14/32 will be located on fill that was prepared for this purpose 25 years ago. The runway will not increase airfield capacity, but will dramatically reduce aircraft and passenger delays during northwest wind conditions.
91.18	Environmental Review Process	Public Process	Massport's administration has circumvented and dishonored its own citizen and business group, the ARC, by ignoring the ARC's stated mission and by trying to manipulate the MEPA process to its advantage....	<p>There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>
91.19	Purpose and Need	Delay	Massport has been greatly concerned with last year's \$313 million loss...their figure is only 20% of what workers and businesses on the ground have incurred as part of the "interruption delay factor".	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
91.20	Alternatives	Runway 14/32	Massport refuses to incorporate a legal document into the FAA Record of Decision that swears that runway 14/32 will be used uni-directionally in perpetuity.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Appropriate supporting documentation will also be issued (<i>e.g.</i>, appropriate designations in the Airport/Facility Directory, and Notices to Airmen or NOTAMS).</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. Refer to Section 8.7 of the Supplemental DEIS/FEIR Draft Section 61 Findings, and the discussion in Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.</p>
91.21	Regional Transportation	Regional Airports	Massport has used Greene and Manchester Airports' growth as a fallback to defend its lack of a comprehensive aviation planning document for Massachusetts for the twenty-second century.	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
91.22	Regional Transportation	Regional Airports	Massport claims to have sincere interest in developing Worcester Airport's potential. If that is so, let them advocate for a compressed development timeframe and the funds necessary for Massport to purchase the airport, increase its infrastructure and build a linking highway to the Massachusetts Turnpike.	<p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with the Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. By its agreement with the City of Worcester, Massport could assume ownership of the Worcester Regional Airport by 2005. On February 1, 2000, Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition, MassHighway is analyzing alternative highway routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport and filed an ENF in December 1999. MassHighway is in the process of preparing a Draft EIS/EIR, which is expected to be filed in October 2001.</p> <p>In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other alternative regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. Refer to Section 2.2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.</p> <p>MassHighway is analyzing alternative routes that would improve surface access from Routes I-90 and I-290 to the Worcester Regional Airport. MassHighway filed an ENF in December 1999 and is in the process of preparing a Draft EIS/EIR, which is expected to be filed in October 2001.</p>

Code	Topic 1	Topic 2	Comment	Response
91.23	Regional Transportation	Regional Airports	Massport must examine the potential use of Hanscom Field as the major operator for commuter operations for Massachusetts. That does not include large scale jet traffic.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.
91.24	Regional Transportation	Regional Airports	As one of the considered alternatives, Massport must study the prospect of siting a new major international airport in Massachusetts.	Comment noted.

Kurt H. Walter
30A Arlington Street
Cambridge, MA 02140

LETTER 92

April 21, 1999

Mr. Robert Durand, Secretary
Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley – EOE No. 10458
100 Cambridge Street, 20th floor
Boston, MA 02202

Dear Mr. Pugsley:

Thank you for this opportunity to comment on the Massport/Federal Aviation Administration DEIS/DEIR. As a member of the Community Advisory Committee to Logan Airport ("CAC") I have been involved in this issue since its inception. As you know, the CAC was one component of the Airside Review Committee ("ARC") formed by Massport to provide input into the process during the development stages, the other being comprised of representatives from the business community. I concur with the report filed by the Consultants to the CAC and would like to take this opportunity to emphasize some points raised in their report.

I first want to point out the lack of public participation in this process. From the first, the CAC's involvement in the ARC project was minimal. There was no interaction between the CAC and Massport other than that which occurred at the irregularly scheduled meetings when Massport and their consultants presented their latest findings. If the CAC requested additional information beyond that presented by the Massport consultants, we were told either that it was not available or that the information we requested would be in the final report or that Massport was paying for a CAC consultant and the CAC could do our own analysis. Our complaints about the lack of comparable data (e.g. use of hours of delays rather than number of operations delayed, percentage increases in regional airports rather than actual operations, etc) produced no results. The Massport consultants steadfastly refused to provide any data that the CAC could use to counter the predetermined outcome of the study, which was that construction of Runway 14/32 was necessary. The DEIS/GEIR is unnecessarily complicated

92.1

by the lack of comparable data through out the report and I suggest that MEPA deny Massport's application until all data regarding delays, traffic at Logan and regional airports, increased capacity, etc. is stated in number of operations.

92.2

From the public testimony of the members of the business component of the CAC, it appears that the business community was extensively consulted on various matters, most significantly the option of peak hour pricing. Massport's selection of alternative 2 as the preferred alternative is a business decision, not an environmental impact decision. The alternatives that include peak hour pricing clearly show a significant, timely delay reduction with minimal environmental impact. Massport's not very impartial study of the impacts of peak hour pricing on the small carriers should be discounted. Massport's claim that peak hour pricing has not been implemented because some communities will lose service is ludicrous. People don't cancel their vacation or business trips because the cost goes up ten dollars. Surely it is preferable for airline passengers to pay another ten dollars to spare the Boston area additional noise and environmental pollution. If Massport is so concerned with the loss of service to the communities served by the regional airlines, then Massport should subsidize them.

92.3

Not only did Massport ignore the requests of the CAC, Massport also has not performed its duty to inform the general public of the potential impacts of Runway 14/32 and of the existence of the MEPA process. Boston's South End neighborhood has not been graced with a visit from Massport, despite numerous requests by city councilors and state representatives. Massport has also not deigned to respond to the many requests of the Cambridge City Council for a meeting with them and the residents of Cambridge. Surely it can not be a coincidence that communities that can expect increases of to 300% were ignored, while every chamber of commerce in the eastern portion of Massachusetts has been recruited by Mr. Blute. Massport has made no attempt to publish the existence of the MEPA process in local papers. If community members did not inform them, citizens would not be aware of the potential impacts and the opportunity to comment to MEPA. MEPA should deny the DEIS/DEIR until every impacted community and their elected representatives have been visited by Massport and have been given the chance to submit their comments to MEPA.

92.4

As the report of the CAC consultants makes clear, Massport can not deliver on its promise of maintaining Runway 14/32 as a unidirectional runway in perpetuity. Peter Blute claims that he will reach an agreement with the FAA which will substantiate this claim, but after three months, where is it? Even if such an agreement could be created, it could easily be overturned by an agency that is already seeking to overturn a state court injunction. What possible agreement could Massport and the FAA create that

could be stronger than a court injunction? Massport is very careful to point out that they are not *currently* filing for the permits to create a bi-directional runway. There is, of course, nothing to stop them from doing so in the future. Massport is deliberately breaking their expansion scheme into small bits that MEPA will be forced to allow under the letter of the law. Massport is using the process designed to protect the environment against MEPA. As there is no substantiated agreement regarding uni-directional status of Runway 14/32 I urge you look beyond the current request and force Massport to calculate the impacts of a *bi-directional* Runway 14/32.. (Actually, I can't understand why MEPA is reviewing permits for construction of a runway already prohibited by Massachusetts. Isn't this process backwards? Shouldn't Massport succeed in lifting the court injunction before the DEIR/DEIS is filed?)

92.5

Massport's filing also touts the potential improved compliance with the noise goals set forth in the Preferential Runway Advisory System (PRAS). Once again, Massport and the FAA can not keep this promise. The FAA has refused to guarantee improved compliance, even after factoring out poor weather conditions. I request that you ask Massport to calculate noise impacts using *actual* runway usage, not some unobtainable goal.

92.6

Massport's noise contours are also misleading. They used only five tracks per runway to calculate noise impacts – and I doubt they used the extremes. In addition, the area impacted by Runway 27 departures has been severely understated. Runway 27 departures fly over the densely populated inner city communities of South Boston, the South End Roxbury and Jamaica Plain. As the current Runway 27 departure flight track was not in use in 1993, Massport has used the "optimal" departure tracks rather than the current actual in their DEIS/DEIR. According to radar tracks released in February 1999, a mere 38% of Runway 27 departures are adhering to the flight track used by Massport to calculate noise impact. Even worse, Massport and the FAA have given up on improving Runway 27 compliance and told the public to learn to live with it. At the very least, Massport should use the current actual flight tracks to calculate noise impact in the DEIS/DEIR.

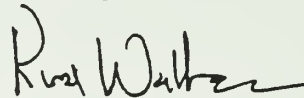
92.7

As the Runway 27 situation has unfortunately proved, any commitments made by Massport and FAA are only as good as their subsequent compliance. The public needs the *subsequent, ongoing* involvement of MEPA and other environmental agencies to ensure that Massport and the FAA keep the commitments they have made to the communities. Any agreements regarding sound proofing, uni-directional status and adherence to PRAS goals need to be fully defined, documented and signed off by all parties, including the communities and their elected officials. The agreements should mandate subsequent review and corrective measures, including punitive monetary damages and the voiding of any

92.8

environmental permits granted in the event of non-compliance. Community members and their elected officials need to have a true voice in the ongoing review process, rather than the lip service Massport currently gives public input and community participation should be required in the drafting of the agreements. The agreements should also be included as an integral part of Massport's filing with MEPA. Agreements binding parties to their commitments are a normal part of the business world and I fail to understand why the environmental process does not require them. No rational business person would enter into a contract which included such unsubstantiated promises. If the data submitted by the CAC consultants is not sufficient to allow you to deny Massport's request, I urge MEPA to make your approval contingent upon the creation of contracts to protect the public and ensure that Massport and FAA honor the commitments they have made to the impacted communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt H. Walter", with a stylized flourish at the end.

Kurt H. Walter

KHW/kw

Letter 92

Community Advisory Committee Representative, Cambridge

Kurt H. Walter

Code	Topic 1	Topic 2	Comment	Response
92.1	Environmental Review Process	Public Process	... I first want to point out the lack of public participation in this process...The Massport consultants steadfastly refused to provide any data that the CAC could use to counter the predetermined outcome of the study....	<p>There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>
92.2	Environmental Review Process	MEPA	...I suggest that MEPA deny Massport's application until all data regarding delays, traffic at Logan and regional airports, increased capacity, etc. is stated in number of operations.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.

Code	Topic 1	Topic 2	Comment	Response
92.3	Alternatives	Preferred Alternative	Massport's selection of alternative 2 (sic) as the preferred alternative is a business decision, not an environmental impact decision. The alternatives that include peak hour pricing clearly show a significant, timely delay reduction with minimal environmental impacts.	<p>Alternative 1A is the preferred alternative.</p> <p>The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR contain analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline Analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR.</p>
92.4	Environmental Review Process	MEPA	MEPA should deny the DEIS/DEIR until every impacted community and their elected representatives have been visited by Massport and have been given the chance to submit their comments to MEPA.	<p>There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

Code	Topic 1	Topic 2	Comment	Response
92.5	Environmental Review Process	MEPA	...I urge you look beyond the current request and force Massport to calculate the impacts of a <i>bi-directional</i> Runway 14/32.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (i.e., all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Appropriate supporting documentation will also be issued (e.g., appropriate designations in the Airport/Facility Directory, and Notices to Airmen or NOTAMS).</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. Refer to Section 8.7 of the Supplemental DEIS/FEIR Draft Section 61 Findings, and the discussion in Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.</p>
92.6	Noise	PRAS, Runway Use	I request that you ask Massport to calculate noise impacts using <i>actual</i> runway usage, not some unobtainable goal (referring to Preferential Runway Advisory System).	During very high demand periods, the controllers have little or no flexibility for runway selection and PRAS recommends an appropriate runway configuration given the extant demand. Unidirectional Runway 14/32 would give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals. The Supplemental DEIS/FEIR demonstrates that the controllers have been improving performance with respect to PRAS recommendations. Section 8.5 of the Supplemental DEIS/FEIR contains methods for more comprehensive monitoring of PRAS. These methods will be implemented as part of the mitigation program for the Airside Project.
92.7	Noise	Model	Massport's noise contours are also misleading...Massport should use the current actual flight tracks to calculate noise impact in the DEIS/DEIR.	The noise analyses in the Airside Project Draft EIS/EIR are based on radar descriptions of the current existing flight tracks, except for the departure track for Runway 27. The departure flight track for Runway 27 is changing to the flight track recommended in the Runway 27 EIS. For studies of future events, a set of tracks more representative of the recommendations is appropriately used.
92.8	Environmental Review Process	MEPA	...I urge MEPA to make your approval contingent upon the creation of contracts to protect the public and ensure that Massport and FAA honor the commitments they have made to the impacted communities.	Massport's mitigation measures are reinforced through compliance with M.G.L. Chapter 30A, Section 61 and through specific state and federal certificates approving projects that have mitigation. The status of the Section 61 Finding commitments are tracked and reported in the <i>Logan Airport 1999 ESPP</i> (previously GEIR). See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.

D.A.N.A.

Dorchester Allied Neighborhood Associations

One Barna Rd
Dorchester, MA 02124
(617) 288-9035
April 22, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
ATTN: Arthur Pugsley, MEPA Unit
100 Cambridge ST, 20th Floor
Boston, MA 02202

RE: LOGAN AIRSIDE IMPROVEMENTS PLANNING PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT
EOEA #10458

Dear Secretary Durand:

Dorchester Allied Neighborhood Associations (D.A.N.A.) represents the many diverse residents and neighborhoods of Dorchester as individuals and through their crime watch and civic and neighborhood associations. I am the Dorchester Representative appointed by D.A.N.A. to the Community Advisory Committee to Massport. At the April 1999 D.A.N.A. meeting, a motion was made, duly seconded and unanimously passed to oppose any expansion of Logan International Airport. D.A.N.A. is opposed to the construction of new runways, specifically Runway 14/32 and we are opposed to the construction of additional taxiways.

The expansion of Logan International Airport must be stopped. Logan International Airport was built in a residential setting. While this may not have posed a problem 75 years ago, today the increased dependence on air transportation in a densely populated urban area makes this unacceptable. The residents of the neighborhoods of Boston, including Dorchester, and all the surrounding communities today suffer an unacceptable level of noise and air pollution. No amount of noise mitigation will solve the problem we face when our windows are open or when we go outside. No amount of noise mitigation will address the very high levels of asthma and other respiratory illness suffered by the residents of Boston.

Massport must not waste taxpayer money building runway 14/32. Instead, they must diligently pursue and maximize the use of an intermodal regional transportation system. The use of several airports located in various metropolitan areas does not solve the problems of noise and air pollution in the city, it only spreads it around. The major growth in the area is outside the Interstate 495 area. With Fort Devens located less than an hour from Boston, the construction of a New England international regional airport at Fort Devens with high speed rail links to the major metropolitan areas is the most responsible approach.

Massport has stated that for Boston to be a "world class city" that attracts tourists and conventioners, Logan International Airport must expand. Boston is the

grand dame of American cities, with considerable historical significance made up of many unique neighborhoods. For Boston to be a "world class city" we must support the neighborhoods. Otherwise, Boston will have no neighborhoods, and she will become a giant convention center, and business and industrial park. Neither tourist nor conventioners will be interested in coming to Boston.

Ultimately, the environmental disaster called Logan International Airport must cease to exist, returning to Boston and Winthrop the land that was theirs. Dorchester, East Boston and all the surrounding communities deserve this,

Three significant items which the DEIS/EIR does not adequately address are:

- ▶No credible case is made for building the proposed Runway 14/32 as a means to solve operational delays at Logan International Airport. It is a thinly veiled capacity enhancing project which will negatively effect large numbers of people.
- ▶The socio-economic and environmental effects from the proposed project on the inner city and the greater metropolitan Boston area is not adequately addressed.
- ▶The noise contour maps are illegible, making it impossible to determine which communities are most adversely effected by which contour, it is not a full disclosure document.

On behalf of D.A.N.A. and myself, I support the Review Comments on Draft Environmental Impact Statement/Draft Environmental Impact Report for the Logan Airside Improvements Planning Project as presented by Massachusetts Port Authority dated February 1999, prepared by Robert G. Burns of Monty Gellys, Montgomery Consulting Group, Inc., David Staudley, P.E., Consultants to the Community Advisory Committee to Massport for the Community Advisory Committee, dated March 29, 1999.

Therefore, we respectfully request that MKPA find the DEIS/EIR to be inadequate and return it to the Massachusetts Port Authority.

Sincerely,



Pamela A. Smith
Dorchester Representative
Community Advisory Committee to Massport

cc: Arthur Pugsley, MEPA Unit
Congressman J. Moakley
Congressman M. Capuano
Senator B. Joyce
Senator S. Lynch
Senator D. Wilkerson
Representative T. Flinneran
Representative G. Fox
Representative E. Malia
Representative S. Owens-Hicks
Representative M. Walsh
Councilor M. Feeney
Councilor C. Yancey

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Letter 93

Community Advisory Committee Representative, Dorchester Dorchester Allied Neighborhood Association Pamela Smith

Code	Topic 1	Topic 2	Comment	Response
93.1	Purpose and Need	Delay	No credible case is made for building the proposed Runway 14/32 as a means to solve operational delays at Logan International Airport. It is a thinly veiled capacity enhancing project which will negatively effect [sic] large numbers of people.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
93.2	Environmental Justice	Impacts	The socio-economic and environmental effects from the proposed project on the inner city and the greater metropolitan Boston area is not adequately addressed.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPR</i> and its updates. Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.
93.3	Noise	Studies	The noise contour maps are illegible....	Refer to the new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.

Mr. Robert Durand
Secretary of Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge St., - 20th floor
Boston, MA 02202
ATTN: Arthur Pugsley
MEDA Unit
File Number - 10458

Dear Secretary Durand:

As the Representative on the Community Advisory Committee from the City of Malden, I must oppose the expansion of Logan Airport. There are other alternatives and options that exist and should be implemented before a new runway and taxiway are employed. Other airports could help relieve the congestion at Logan. New Bedford Airport is begging for improvements so they can become a reliever airport. Hanscom Airport in Bedford, has existing runways which could handle any aircraft, yet Massport will not consider using it for anything other than what it is being used for now, despite the fact that it lost 1.9 million dollars last year. The fact that 54% of Logan passengers come from 128 and beyond makes Hanscom a perfect location for another usable airport.

94.1

The EIS/EIR is a flawed report that should be withdrawn. It uses 1993 as the base year, but was not released until 1999. The weather data used is from 1981-1990, and weather patterns have changed since then. This report only goes out to the year 2010, which is only 11 years away. If the proposed expansion were to go forward, its completion date would be 2005. By Massports estimates, the delay problem will be worse in 2010 than it is today, even with the expansion, yet they have no plan to deal with this problem. This is a shortsighted approach to a long-term problem. A 20-year outlook should be used, and a second major airport study should be revisited. Peak hour pricing and the expanded use of other airports, along with improved infrastructure to Worcester Airport are all options that should be implemented before any Logan improvements are considered.

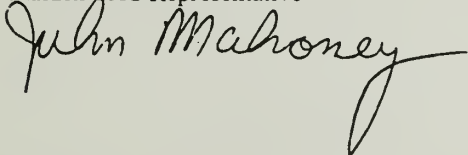
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94.4

-Sincerely,

John J. Mahoney
Malden CAC Representative



Code	Topic 1	Topic 2	Comment	Response
94.3	Analysis Assumptions/ Methodologies	Planning Period	This report only goes out to the year 2010, which is only 11 years away...A 20-year outlook should be used....	Massport has developed a range of potential future traffic levels for planning purposes. For a variety of reasons, Massport believes that the forecasts described as 1999 and 2010 projections in the <i>Logan Airside Improvements Feasibility Study, Phase I Report and the DEIS/EIR</i> will not be achieved until after 1999 and 2010, respectively. The Airport is likely to reach 29 million passengers (formerly the "1999" forecast) in 2003. Developments at the regional airports and Amtrak's high speed Acela Express rail service to New York are expected to further slow Logan Airport's passenger traffic growth. As a result, Logan Airport is now expected to reach 37.5 million passengers in 2015 and 45 million passengers in 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period that extends beyond 2020. Refer to Chapters 1 and 4 of the Supplemental Draft EIS/Final EIR for a complete discussion of the planning forecasts.
94.4	Alternatives	Peak Period Pricing	Peak hour pricing and the expanded use of other airports... should be implemented before any Logan improvements are considered.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport and provides an assessment of the extent of the benefits from PPP under such circumstances. Analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR.</p> <p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p>

4/20/99

Dear Mr. Pugsley,

LETTER 95

The community of Hingham has not been fairly considered in the EIS/EIR produced by MASSPORT. Therefore, I oppose the proposed runway expansion.

CURRENTLY, we experience over our neighborhood, 1 flight per minute at low altitude, for HOURS ON END. Having a conversation outside is next to impossible. We get woken up at night.

What is the impact on our CHILDREN'S HEALTH WITH THE PRESENT NUMBER OF FLIGHTS OVER OUR NEIGHBORHOOD? 95.1
Does the fact that our state park (Wompatuck) and our reservation lands offer no solitude because of MASSPORT operations?

IF THIS IS NOW, WHAT ARE WE SUPPOSED TO DO WHEN FLIGHTS OVER HINGHAM TRIPLE? Is the developing of Boston as a corporate convenience center more important to NEPA than the VERY REAL impact of MASSPORT'S operations currently and in the future to our community's environmental and public health?

In the name of God and upholding
the spirit of your position, I
ask you to find this environmental
impact statement inadequate and to
recommend a regional solution to
this issue. Thank you. 95.2

Sincerely,

Richard Goldhammer
CAC representative
Hingham, Massachusetts

Letter 95

Community Advisory

Committee Representative, Hingham

Richard Goldhammer

Code	Topic 1	Topic 2	Comment	Response
95.1	Noise	Impacts	What is the impact on our CHILDREN'S HEALTH WITH THE PRESENT NUMBER OF FLIGHTS OVER OUR NEIGHBORHOOD?...WHAT ARE WE SUPPOSED TO DO WHEN FLIGHTS OVER HINGHAM TRIPLE?	There is no evidence to suggest that the levels of environmental noise generated by Logan Airport are a health risk to residents. This is especially true in Hingham where DNL levels from Logan Airport overflights are on the order of 55 dB or less, some 20 dB below the highest exposure levels experienced by communities much closer to Logan Airport.
95.2	Environmental Review Process	MEPA	...I ask you to find this environmental impact statement inadequate and to recommend a regional solution to this issue.	<p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.</p> <p>Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>

